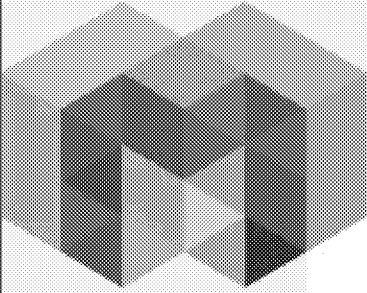


## EXHIBIT 40

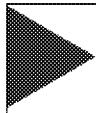
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NOT FOR DISTRIBUTION**

**Please note: Fact-checking, annotations, and  
references are not final. Will be finalized next draft.**



## **Opioids in Acute Pain Management**

 **Mallinckrodt**  
Pharmaceuticals



## Objectives



- Describe the changing market for opioids to treat pain
- Explain the regulatory issues affecting the opioid market, including regulations pertaining to risk mitigation
- Discuss the FDA guidance on abuse deterrent formulations and its impact on label claims
- Identify the 5 primary competitors in the treatment of acute pain

2

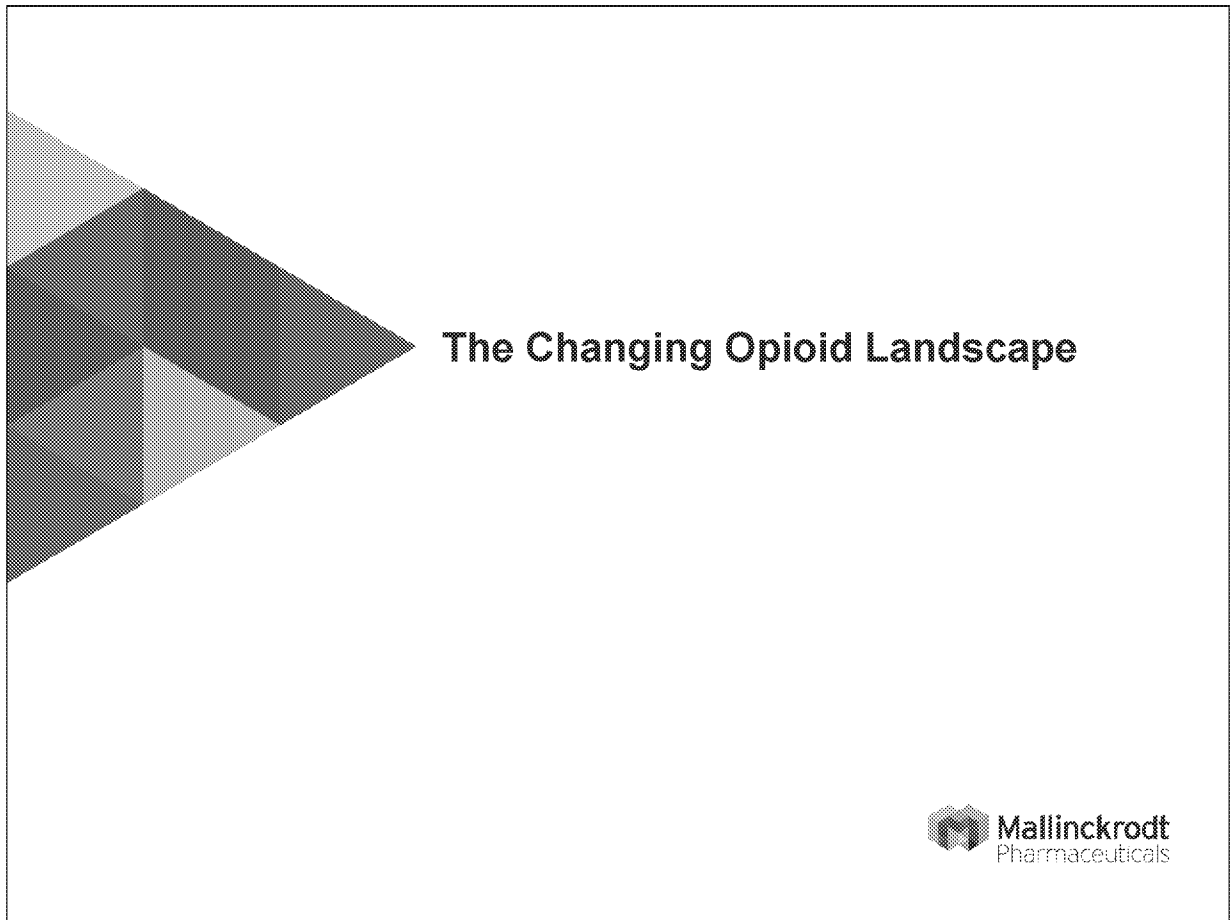
Upon completing review of this topic, the participant will be able to:

Describe the changing market for opioids to treat pain

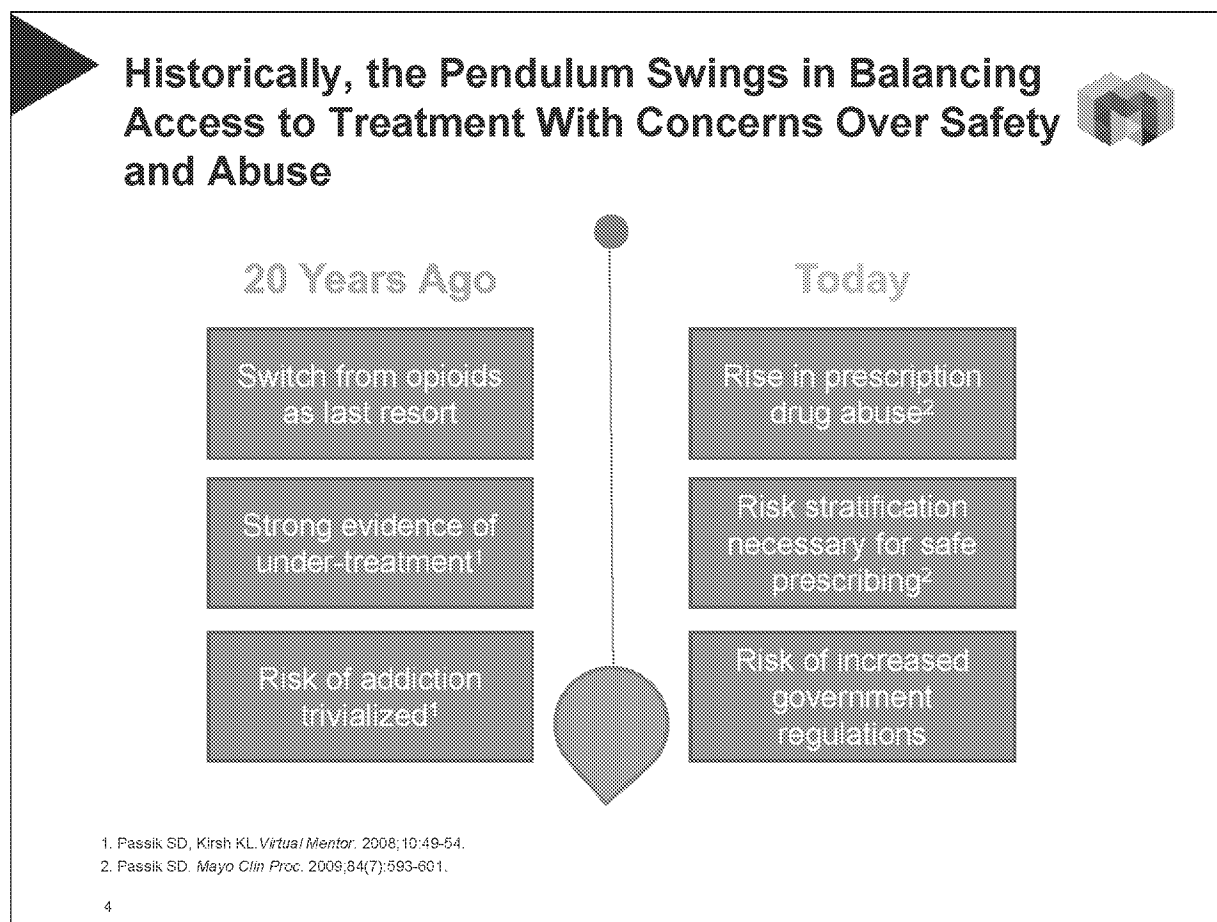
Explain the regulatory issues affecting the opioid market, including regulations pertaining to acetaminophen and abuse deterrence

Describe current abuse deterrence products and overview concepts in the pipeline

Identify the 5 primary competitors in the treatment of acute pain







Opioids are effective in treating pain and have been available for thousands of years.<sup>1</sup> Historically, in society issues around the use of opioids swing like a pendulum from balancing access to treatment for patients with pain to increased concerns over safety and abuse. At one extreme, irrational fear of addiction resulted in substantial under-treatment of pain.<sup>1</sup> Two decades ago, the prevailing view shifted to the other extreme of trivializing the risk for addiction.<sup>1</sup> Successful treatment of cancer patients without incurring addiction led to a belief that refraining from treating pain was unethical. Indiscriminate use of opioids resulted in greater availability of prescription pain medications as well as in a rise in their abuse.<sup>2</sup> In turn, this has led to a more balanced understanding that risk stratification is important for safe prescribing and that government regulation is needed to moderate the public health consequences of abuse of prescription pain medications.<sup>1,2</sup>

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Passick, 2008 pg 49 (A)

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Passick, 2008 pg 49 (C)  
Passick, 2008 pg 49 (B)  
Passick, 2009 pg 593 (A)  
Passick, 2009 pg 596 (A)  
Passick, 2009 pg 593 (A)  
Passick, 2008pg 50 (A)  
AAPM, 2013 p.1 A

## The Regulatory Environment Evolves<sup>1</sup> as Media Coverage Continues to Focus on Opioid Abuse

<b>2013</b>	<b>Labeling Changes for ER/LA opioids</b> FDA announces classwide safety labeling changes and new postmarket study requirements for all ER/LA opioid analgesics <sup>1</sup>	<b>Pharmacy Times – July 3<sup>rd</sup>, 2013</b> <b>“Opioid Overdose and Death Rates Skyrocket in Women”<sup>6</sup></b>
	<b>Guidance on Abuse Deterrent Language</b> FDA issues draft guidance to assist industry in developing new opioid formulations with abuse-deterrent properties <sup>3</sup>	<b>The Wall Street Journal – July 2<sup>nd</sup>, 2013</b> <b>“Painkiller Deaths Rise Faster in Women”<sup>7</sup></b>
	<b>OxyContin Abuse Deterrent Language Approved</b> FDA removes generic OxyContin (oxycodone) from marketplace <sup>4</sup>	<b>NPR – July 3<sup>rd</sup>, 2013</b> <b>“A Surge in Painkiller Overdoses Among Women”<sup>8</sup></b>
<b>2012</b>	<b>Classwide REMS Approved</b> Classwide REMS approved by the FDA for ER/LA opioids <sup>2</sup>	<b>The Huffington Post – July 3<sup>rd</sup>, 2013</b> <b>“Women and Drugs: The Final Drug War Taboo?”<sup>9</sup></b>

ER/LA = extended release/long-acting; REMS = risk evaluation and mitigation strategy.

1. Food and Drug Administration. FDA announces safety labeling changes and postmarket study requirements for extended-release and long-acting opioid analgesics. <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm367726.htm>. September 10, 2013. Accessed September 30, 2013. 2. FDA News Release. FDA issues draft guidance on abuse-deterrent opioids. <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm336286.htm>. January 9, 2013. Accessed September 30, 2013. 3. FDA News Release. FDA approves abuse-deterrent labeling for reformulated OxyContin. <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm342261.htm>. April 16, 2013. Accessed September 27, 2013. 4. Food and Drug Administration. Questions and Answers: FDA approves a Risk Evaluation and Mitigation Strategy (REMS) for Extended-Release and Long-Acting (ER/LA) opioid analgesics. <http://www.fda.gov/Drugs/DrugSafety/InformationbyDrugClass/ucm309742.htm>. July 9, 2012. Updated April 26, 2013. Accessed September 30, 2013. 5. Simone A. Opioid overdose and death rates skyrocket in women. *Pharmacy Times*. <http://www.pharmacytimes.com/news/Opinion/Overdose-and-Death-Rates-Skyrocket-in-Women>. Published July 3, 2013. Accessed September 27, 2013. 6. Martin TW. Painkiller deaths rise faster in women. *Wall Street Journal*. <http://online.wsj.com/article/SB1001424127687324436104578163346710336.html>. July 3, 2013. Accessed September 27, 2013. 7. Naudtjums J. Neighborhood P. A surge in painkiller overdoses among women. NPR Web site. Shots: Health News From NPR. <http://www.npr.org/2013/07/03/236426122/a-surge-in-painkiller-overdoses-among-women>. July 3, 2013. Accessed September 27, 2013. 8. Ralston M. *Huffington Post*. [http://www.huffingtonpost.com/meghan-ralston/women-and-drugs-the-final-war-taboo?hpid=hp\\_hp-top-table-main-drug-abuse\\_3\\_3642616.html](http://www.huffingtonpost.com/meghan-ralston/women-and-drugs-the-final-war-taboo?hpid=hp_hp-top-table-main-drug-abuse_3_3642616.html). July 3, 2013. Accessed September 27, 2013.

The regulatory environment is currently evolving in an attempt to balance challenges of access to treatment with concerns over safety and abuse.<sup>1</sup> In 2012, classwide risk evaluation and mitigation strategies (REMS) were approved by the FDA, which include voluntary training for prescribers on opioids.<sup>2</sup> In January 2013, the FDA issued guidance for manufacturers on abuse-deterrent opioids.<sup>3</sup> The guidance was specific to study design, study evaluation and label claims resulting from these studies. Also in 2013, the FDA approved language confirming abuse-deterrent properties of OxyContin and removes generic OxyContin (oxycodone) from the marketplace.<sup>4</sup> In September 2013, the FDA announced safety labeling changes and postmarket study requirements for extended-release and long-acting opioid analgesics.<sup>5</sup>

As the regulatory environment evolves, opioid abuse continues to be a focus in the media. Opioid pain medications have been in the news for many years, but here we show some of the key headlines since the release of the July 2013 CDC Report. The report focused on the rise of abuse and abuse-related outcomes for women, but the story is the same across other populations, including the Medicare population and teens between 12-17 years of age. These headlines clearly illustrate the degree of interest in this issue as well as the media focus on opioid abuse and its ramifications as a high-profile, national issue.<sup>6-9</sup>

## References

- Food and Drug Administration. Guidance for Industry: Development and use of risk minimization action plans. [www.fda.gov/downloads/drugs/guidancecomplianceregulatoryinformation/guidances/ucm071616.pdf](http://www.fda.gov/downloads/drugs/guidancecomplianceregulatoryinformation/guidances/ucm071616.pdf) - 176k March 2005. Accessed September 26, 2013.
- FDA News Release. Risk Evaluation and Mitigation Strategy (REMS) for Extended-Release and Long-Acting Opioids. <http://www.fda.gov/Drugs/DrugSafety/InformationbyDrugClass/ucm309742.htm>. Accessed August 5, 2013.

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Simone A. Opioid Overdose and Death Rates Skyrocket in Women. Pharmacy Times. July 3, 2013.

Martin TW. Painkiller Deaths Rise Faster in Women. Wall Street Journal. July 2, 2013.

Naudziunas J et al. A Surge in Painkiller Overdoses Among Women. NPR. July 3, 2013.

Ralston M. Women and Drugs: The Final Drug War Taboo? Huff Post. July 3, 2013.

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FDA News Release Sep 2013

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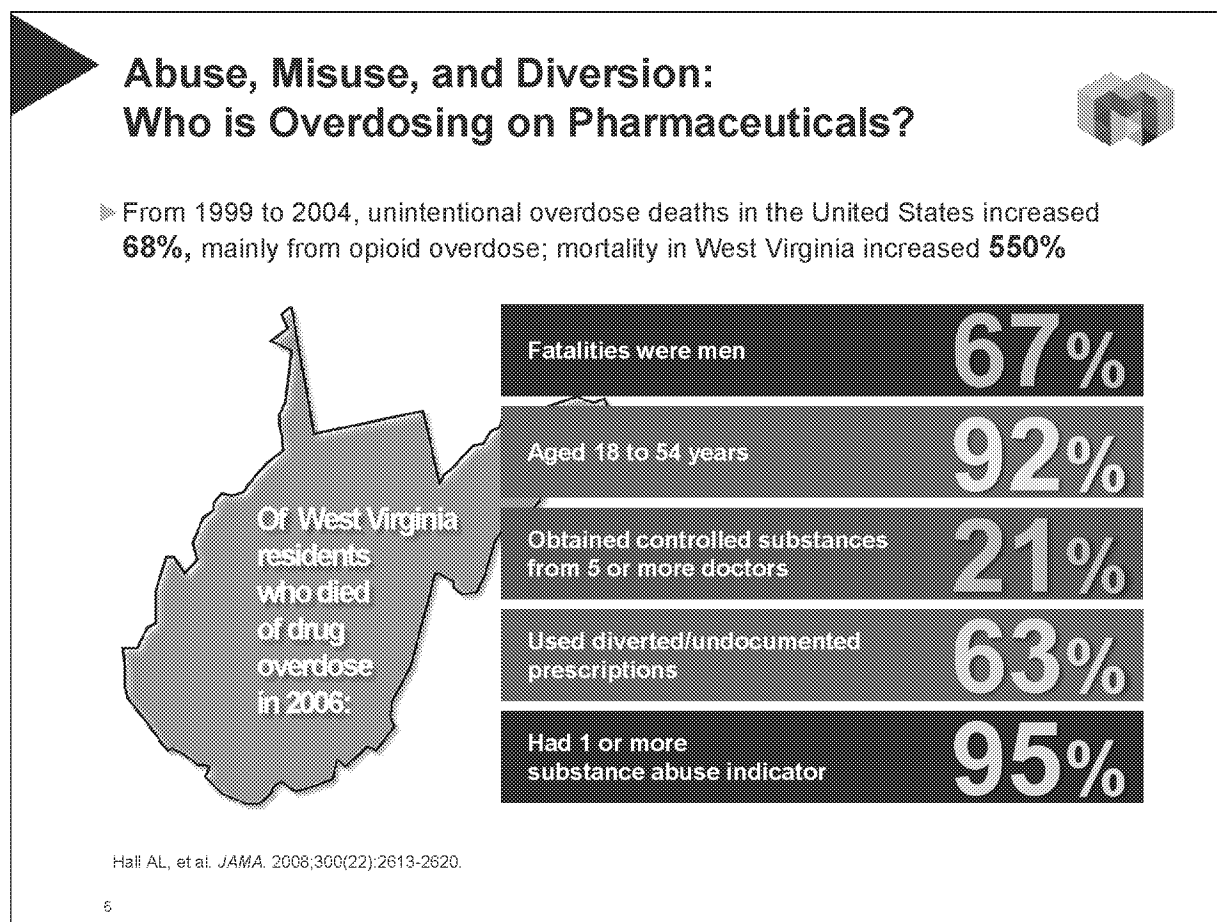
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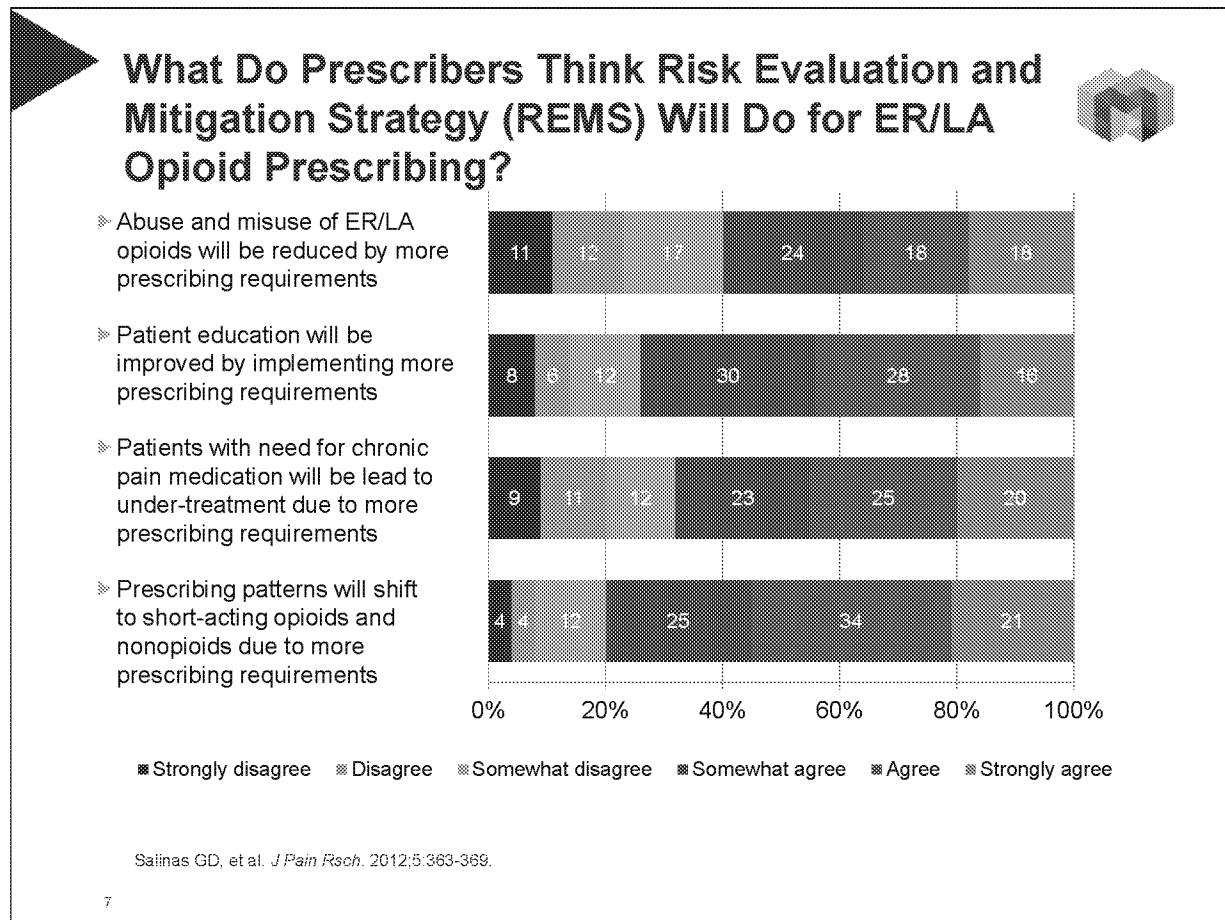


Epidemiologically, in the United States the effects of what has been called a pharmacoepidemic have been most pronounced in the rural states, such as West Virginia, where the nation's largest overdose mortality increase occurred from 1999 through 2004. This study evaluated the risk factors most associated with those who died of unintentional pharmaceutical overdose in West Virginia in 2006. Nearly all of the unintentional overdose deaths involved prescription drugs and prescription opioids played a significant role in these deaths. Fewer than 25% of these deaths involved alcohol, illicit drugs or routes of administration considered nonmedical. Of all 295 persons who died, multiple substances contributed to the fatal overdose in 234 (79.3%) of these individuals. With a range of 1 to 5, the mean number of contributing prescription drugs was 2. Opioids were the most prevalent drug class, contributing to 93.2% of the fatalities, 44.4% of which were associated with prescription documentation for all contributing opioids. Methadone was the most commonly identified drug and was involved in 112 (40.0%) of the deaths.

Prescribing clinicians are urged to follow guidelines and to refer patients to pain management specialists as needed. They are also urged to consult state drug monitoring programs, available in most states, in order to see if their patients are securing scheduled drugs from other doctors.

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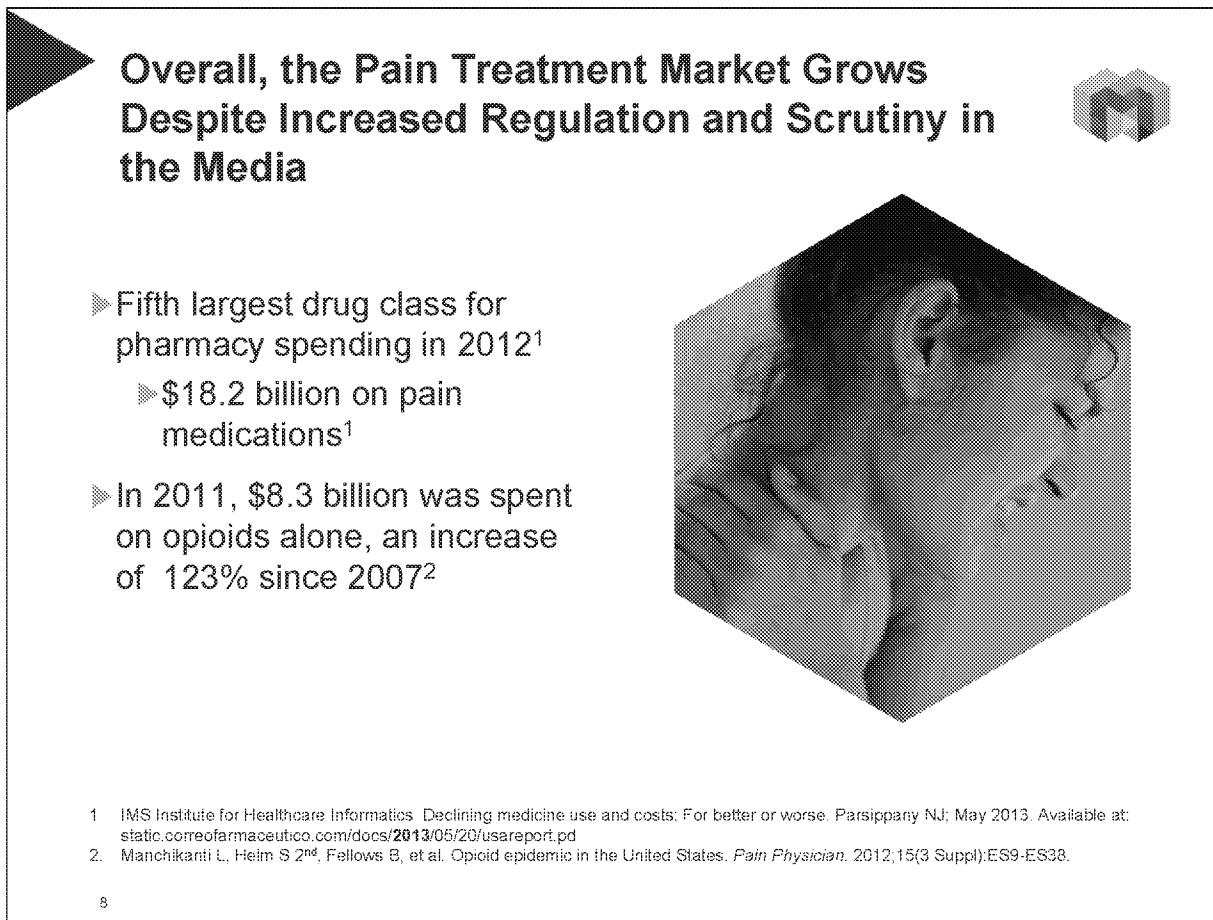


What do prescribers think about increased regulatory efforts to reduce abuse and increase safety in the use of opioids? Primary care physicians were asked to evaluate how they felt about the 4 bulleted statements regarding the effect of REMS on opioid prescribing and to rate whether they disagreed or agreed on a scale (strongly disagree, disagree, somewhat disagree, somewhat agree, agree and strongly agree). A significant number of these PCPs are cautious about the additional requirements that REMS policies may place on them and how these policies may impact their patients, as reflected above. Only about 8 of them consider themselves very familiar with the FDA REMS requirements, and many PCPs who responded to this survey felt that increased requirements will have a negative impact on pain management without positively impacting patient education and drug abuse or misuse. More than 50% felt that including a medication guide in the requirements would have no impact on patient care, and 24% felt the same regarding communication plans.<sup>1</sup>

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## Overall, the Pain Treatment Market Grows Despite Increased Regulation and Scrutiny in the Media

- Fifth largest drug class for pharmacy spending in 2012<sup>1</sup>
  - \$18.2 billion on pain medications<sup>1</sup>
- In 2011, \$8.3 billion was spent on opioids alone, an increase of 123% since 2007<sup>2</sup>



1. IMS Institute for Healthcare Informatics. Declining medicine use and costs: For better or worse. Parsippany NJ; May 2013. Available at: [static.correofarmaceutico.com/docs/2013/05/20/usareport.pdf](http://static.correofarmaceutico.com/docs/2013/05/20/usareport.pdf)

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8

The pain treatment market continues to grow despite legal and regulatory changes and media coverage that address increasing morbidity and mortality associated with nonmedical use of prescription pain medications.<sup>1</sup> In 2012, \$18.2 billion was spent on pain medications in the United States, making it the fifth largest drug class for pharmacy expenditures.<sup>2</sup> In 2011, \$8.34 billion was spent on opioids, an increase of 123% since 2007.<sup>3</sup>

#### References

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Manchikanti L, Helm S 2<sup>nd</sup>, Fellows B, et al. Opioid epidemic in the United States. *Pain Physician*. 2012;15(3 Suppl):ES9-ES38.

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IMS 2013 pg 2 (A)

IMS 2013 pg 32 (A)

American Academy of Pain Medicine. <http://www.painmed.org/advocacy/remis/opioid-risk-evaluation-and-mitigation-strategies-remis-update/> Accessed September 6, 2013.

IMS Institute for Healthcare Informatics. Declining medicine use and costs: For better or worse. Parsippany NJ; May 2013.

Manchikanti L, et al. Opioid Epidemic in the United States. *Pain Physician* 2012; 15:ES9-ES38.

Manchikanti, 2012 p. ES26 Table 7

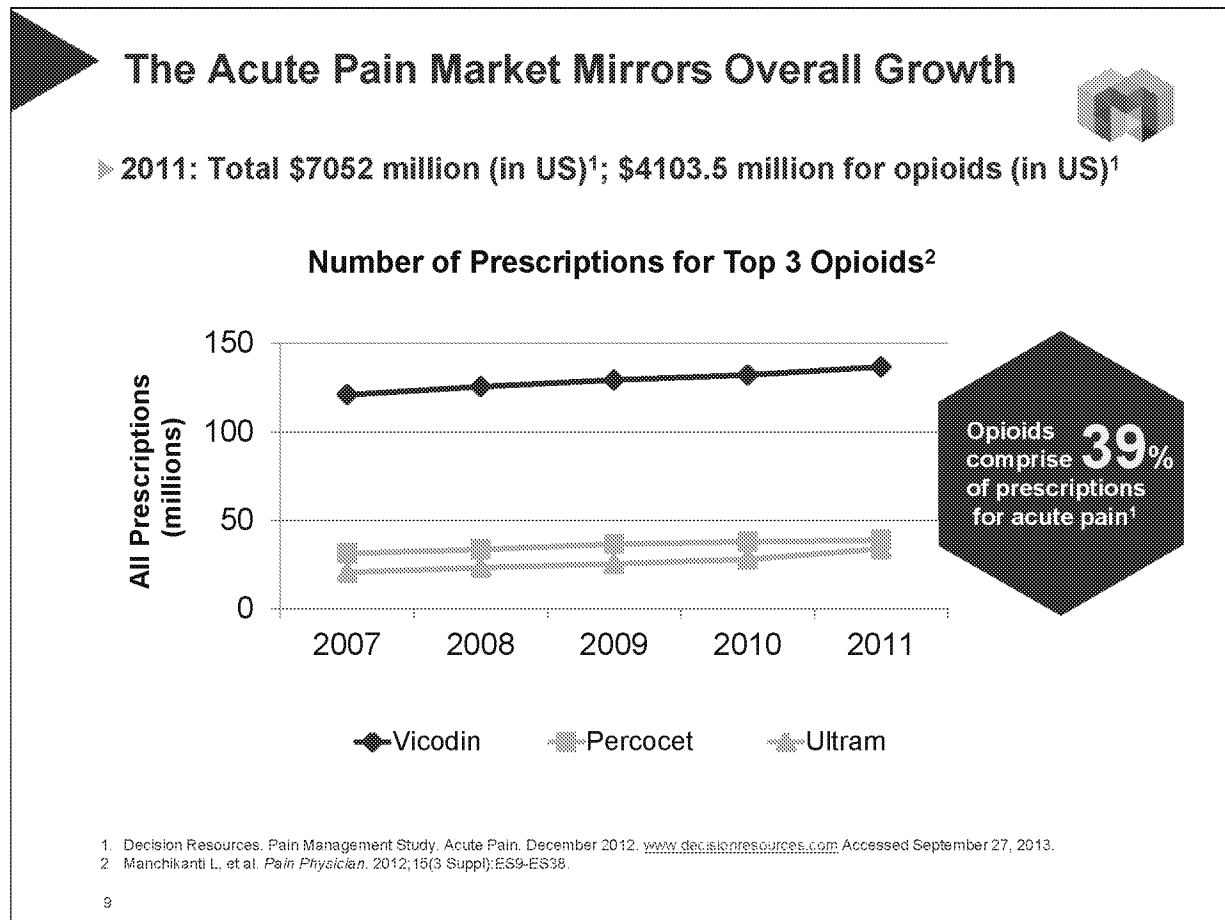
IMS 2013 pg 2 (A)

IMS 2013 pg 32 (A)

Manchikanti, 2012 p. ES26 Table 7

AAPM, 2013 p.1 A





Of all prescriptions for acute pain, 39% are for opioids, accounting for \$4103.5 million in sales in the US in 2011. Between 2007 and 2011, the opioid market remained stable. By far the largest number of prescriptions have been written for Vicodin® (acetaminophen and hydrocodone). Percocet® (oxycodone and acetaminophen) and Ultram® (tramadol hydrochloride) are a distant second and third, respectively.

#### References

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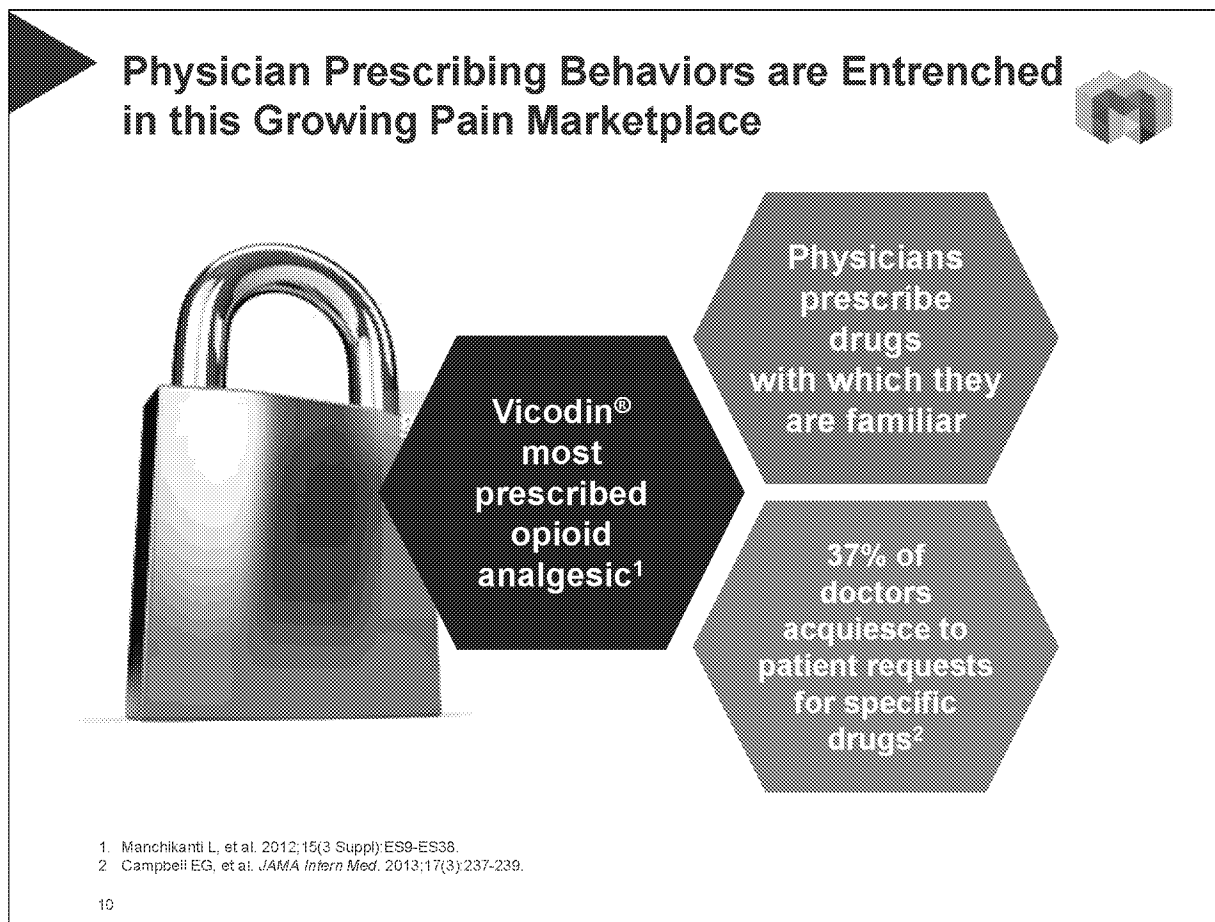
Manchikanti L, Helm S 2nd, Fellows B, et al. Opioid epidemic in the United States. *Pain Physician*. 2012;15(3 Suppl):ES9-ES38.

Decision Resources p 163A

Decision Resources p 2A

Manchikanti p ES23A

Manchikanti p ES25A



Market share for Vicodin, Percocet, and Ultram have remained stable since at least 2007. This is attributable, in part, to entrenched physician prescribing habits in this growing marketplace. Physicians have a tendency to prescribe their patients drugs with which they are familiar. Moreover, when patients ask for brand-name drugs, a little over one-third of physicians acquiesce despite the availability of less expensive options.

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Campbell EG, Pham-Kanter G, Vogeli C. Physician acquiescence to patient demands for brand-named drugs: Results of a national survey of physicians. JAMA Intern Med. 2013;17(3):237-239.

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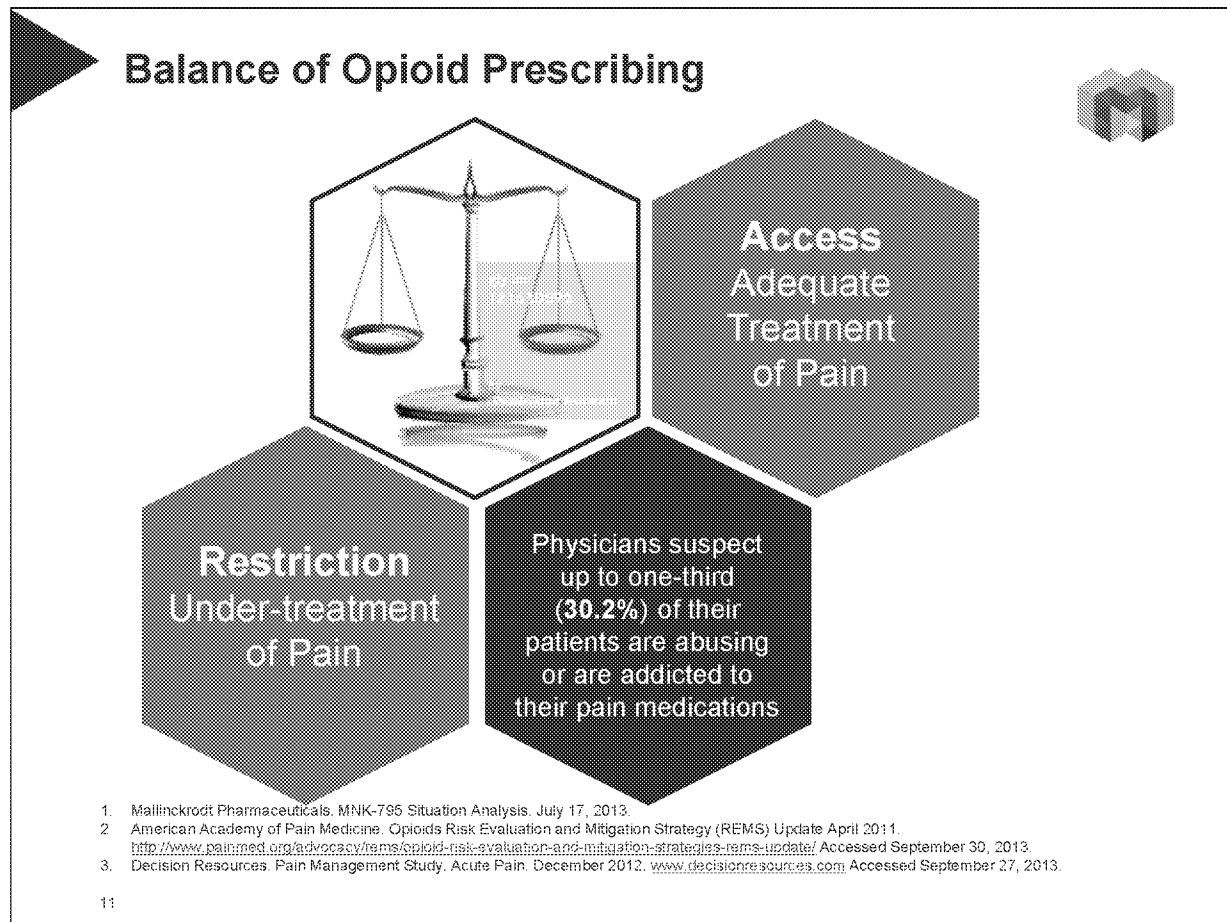
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Campbell 2012 p. 237A; p238A

Manchikanti p ES25A

Campbell 2012 p. 237A; p238A

Manchikanti p ES25A



The struggle to balance adequate treatment of pain against growing opioid use and the problems of misuse continues. Mallinckrodt market research shows that physicians suspect almost one-third (30.2%) of their patients are abusing or are addicted to their pain meds.<sup>1</sup> Pain specialists (>50%) and primary care practitioners (69%) reported that concern about diversion of opioids is a factor in prescribing.

According to Lynn Webster, MD, president-elect of the American Academy of Pain Medicine, “There are consequences for not treating pain, as there are consequences when we prescribe opioids to somebody at risk for addiction. The problem of prescription drug abuse and the problem of treating pain will require a broad coalition of people — it will require the regulatory community, medical community and legal community to jointly come together to solve this problem. No one group will be able to solve this problem by themselves.”<sup>2</sup>

This challenge provides an opportunity in the marketplace to develop abuse-deterrent formulations of opioid pain medications as well as drugs with better safety and tolerability.<sup>3</sup>

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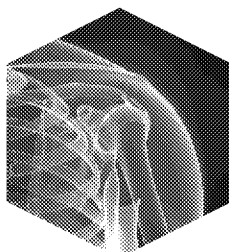
Decision Resources, 2012 pg 10A; pg11A

American Academy of Pain Medicine, 2012 pg 10A; pg11A

Mallinkrodt Situation Analysis slides 45

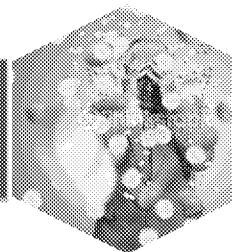
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## Summary

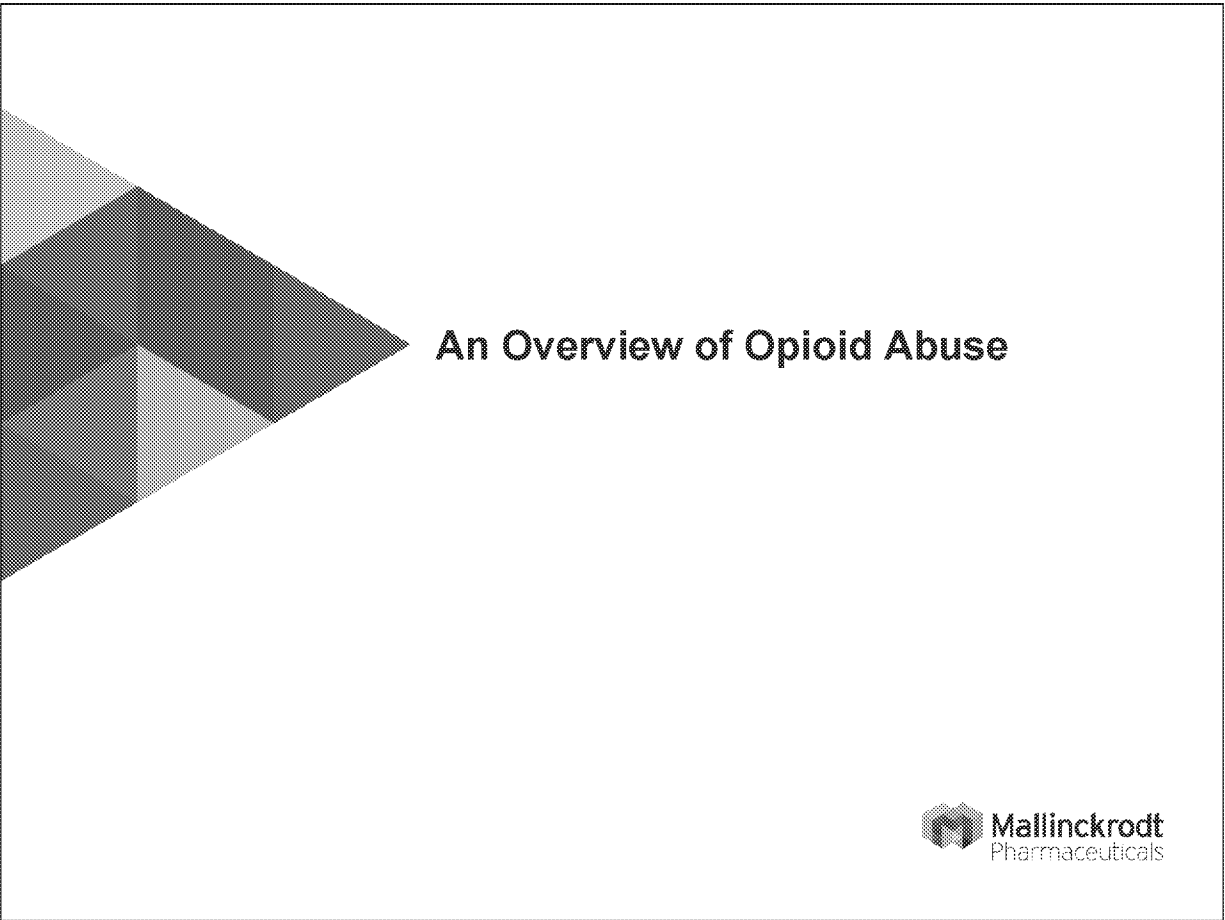


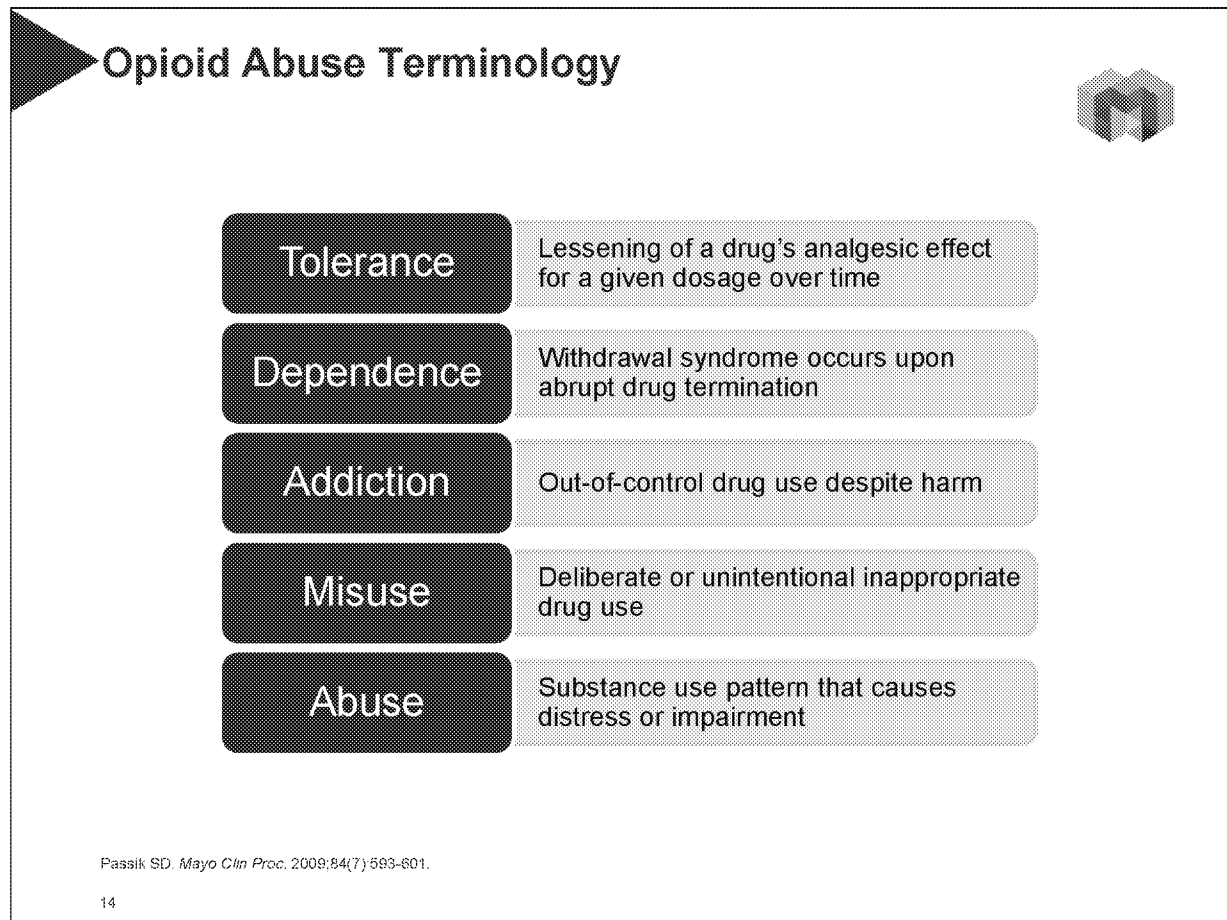
Pain is the fifth largest healthcare spending market and is still growing

The paradigm for prescribing opioids swings from concerns about under-treatment to concerns about abuse and addiction



Acute pain is an entrenched market driven by habitual rather than intentional prescribing of Vicodin® and Percocet®





**Opioid Abuse Terminology**

<b>Tolerance</b>	Lessening of a drug's analgesic effect for a given dosage over time
<b>Dependence</b>	Withdrawal syndrome occurs upon abrupt drug termination
<b>Addiction</b>	Out-of-control drug use despite harm
<b>Misuse</b>	Deliberate or unintentional inappropriate drug use
<b>Abuse</b>	Substance use pattern that causes distress or impairment

Passik SD. *Mayo Clin Proc.* 2009;84(7):593-601.

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Before discussing opioid abuse we need to review terminology. Numerous terms are commonly used to describe side effects of opioid use and the problematic behaviors of addiction, misuse and abuse.

Tolerance – lessening of a drug's analgesic effect for a given dosage so a higher dose is needed to provide comparable pain relief over time

Dependence – development of withdrawal symptoms upon abrupt termination of drug treatment

Addiction – substance abuse involving out-of-control, compulsive use of drug despite harm

Misuse – not using a drug as prescribed, either deliberately or unintentionally

Abuse – maladaptive pattern of substance use leading to considerable distress or harm

#### References

1. Passik SD. Issues in long-term opioid therapy: unmet needs, risks, and solutions. *Mayo Clin Proc.* 2009;84(7):593-601.

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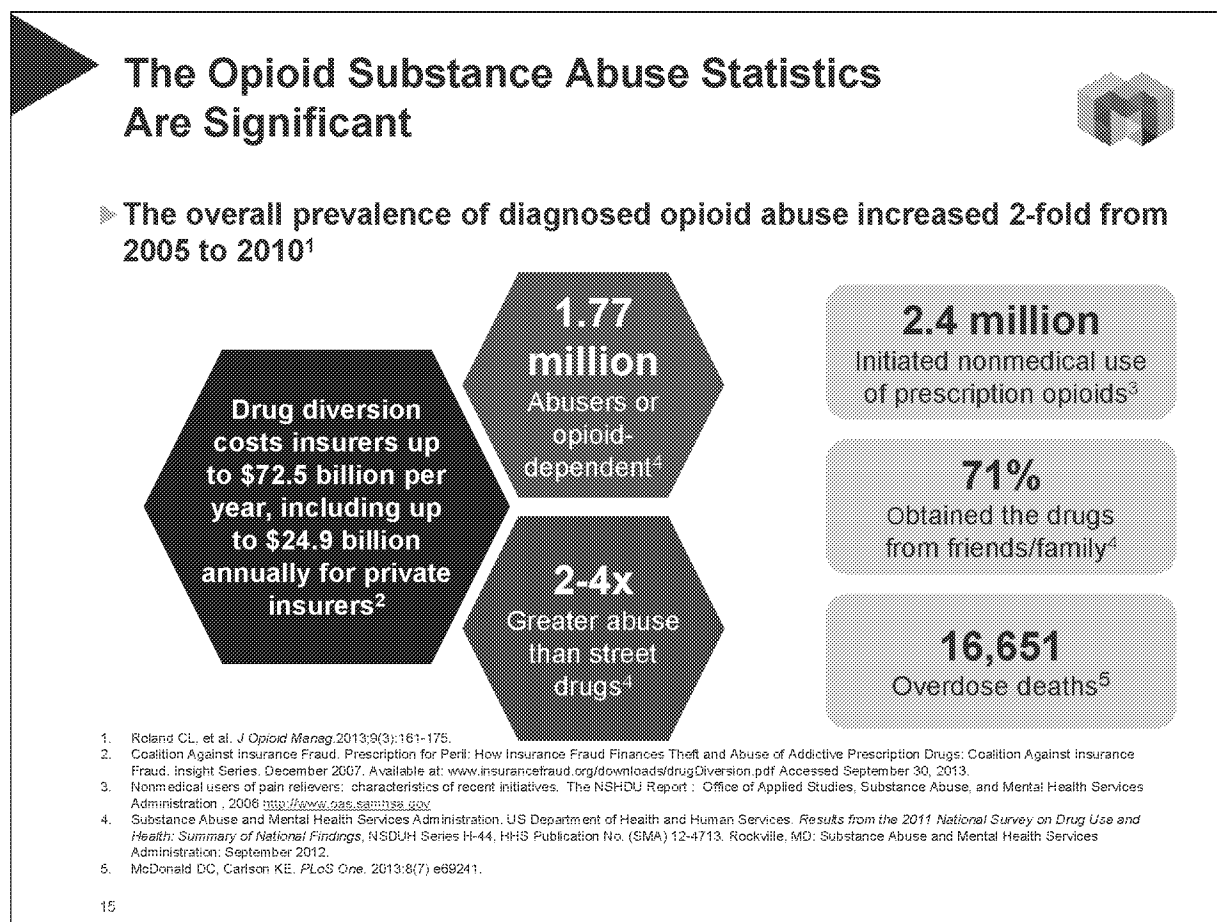
<http://www.hcplive.com/publications/pain-management/2011/december-2011/Abuse-deterrent-Technologies-in-Opioid-Medications-A-New-Weapon-in-the-Fight-against-Misuse-and-Abuse>

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Passik. 2009 p. 598B.

Passik. 2009 p. 598B.





The statistics on opioid abuse are significant. In 2006, it was estimated that 2.2–2.4 million individuals initiate nonmedical use of prescription opioids in the United States each year. Nonmedical use entails use without a prescription of the individual's own, or use simply for the experience or feeling the drugs caused. There were 1.77 million abusers or drug dependent individuals in 2011; pain relievers were second only to marijuana as the products used by abusers. The percentage of users who obtained prescription drugs from friends or relatives for free was 54%, while the percentage who either purchased opioids from family or friends or took them without permission was 17% for a total of 71% obtaining drugs from family or friends. The abuse of multiple of pain relievers is 2 to 4 times that of cocaine or heroin, respectively. Use of pain relievers in abuse or drug dependence was 2.15 times greater than that of cocaine and 4.15 times greater than that of heroin. The annual costs of drug diversion for insurers are up to \$72.5 billion dollars per year, with almost \$25 billion in costs to private insurers. The number of overdose deaths from opioid pain relievers in 2010 was 16,651. Opioid overdose deaths are now twice as common as heroin and cocaine overdose deaths combined.

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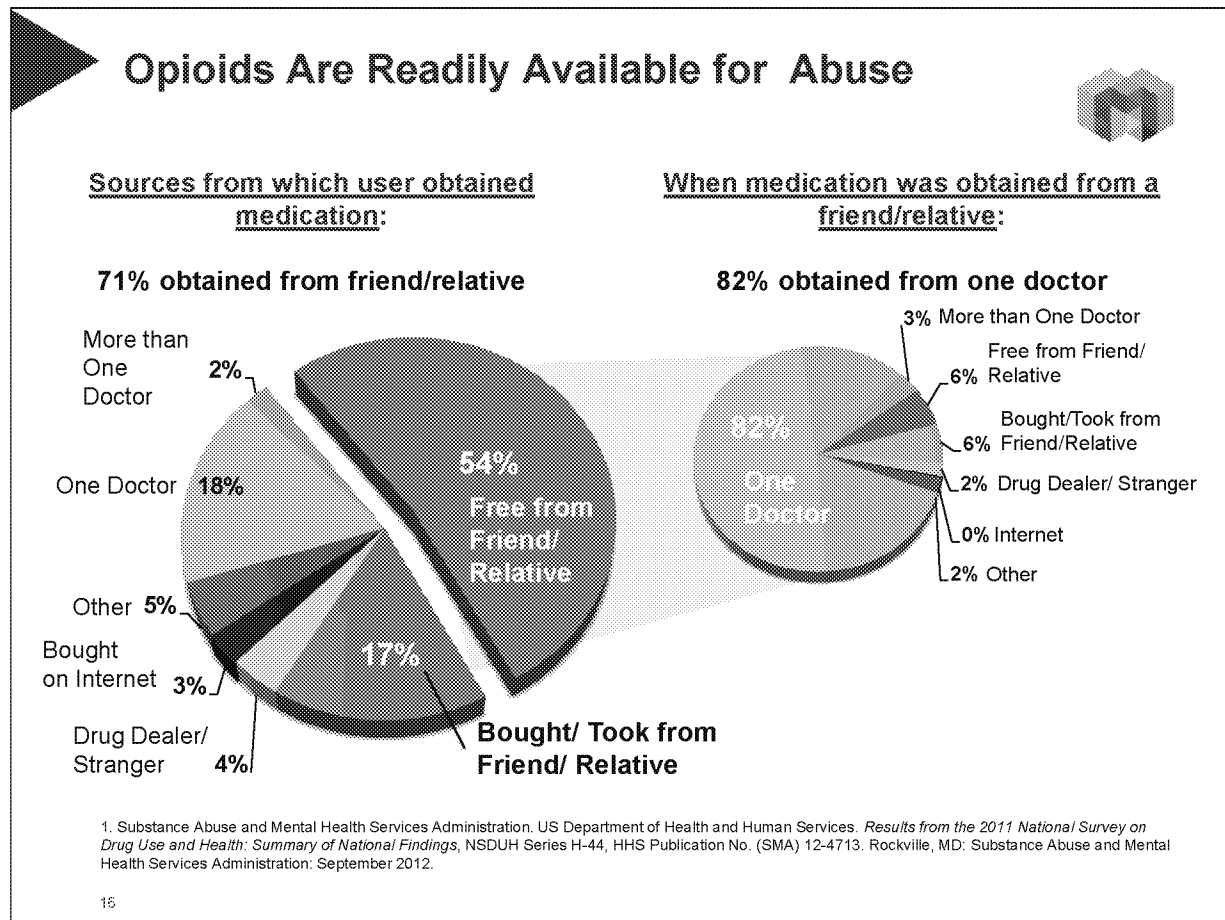
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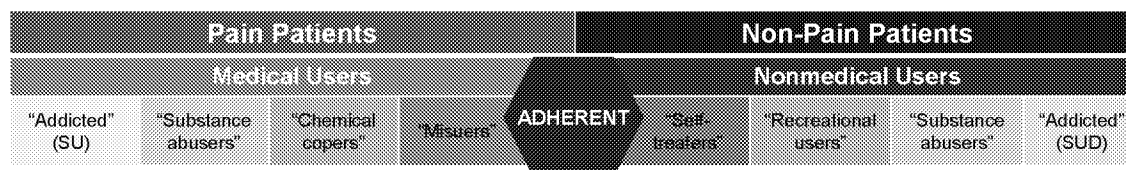
The overall message is that opioids are readily available for abuse. If we look a little deeper at the friends and relatives, of the friends or relatives, 82% obtained the drugs from a single doctor, so they were not “doctor-shopping.” The pills obtained are usually prescribed for medical use, but the prescription is not finished. The unfinished pills are then taken for nonmedical reasons by the original patient or friends/family.

#### References

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Ref 19 page 41

## Misuse, Abuse, and Addiction Occurs in Pain and Non-pain Patients<sup>1</sup>



- While the majority of patients may be strictly adherent, some misuse opioids by taking them other than as directed or indicated for a medical purpose
- Others still may abuse their prescription opioids to cope with stressors
- In addition, some fall into categories of severe and consistent substance abuse or addiction

- Opioid usage varies in non-pain patients, with some self-treating pain while others use the drugs recreationally
- Others are more severe and consistent users further to the left of the spectrum

Passik SD, Kirsh KL. The interface between pain and drug abuse and the evolution of strategies to optimize pain management while minimizing drug abuse. *Exp Clin Psychopharmacol*. 2008;16(5):400-404.

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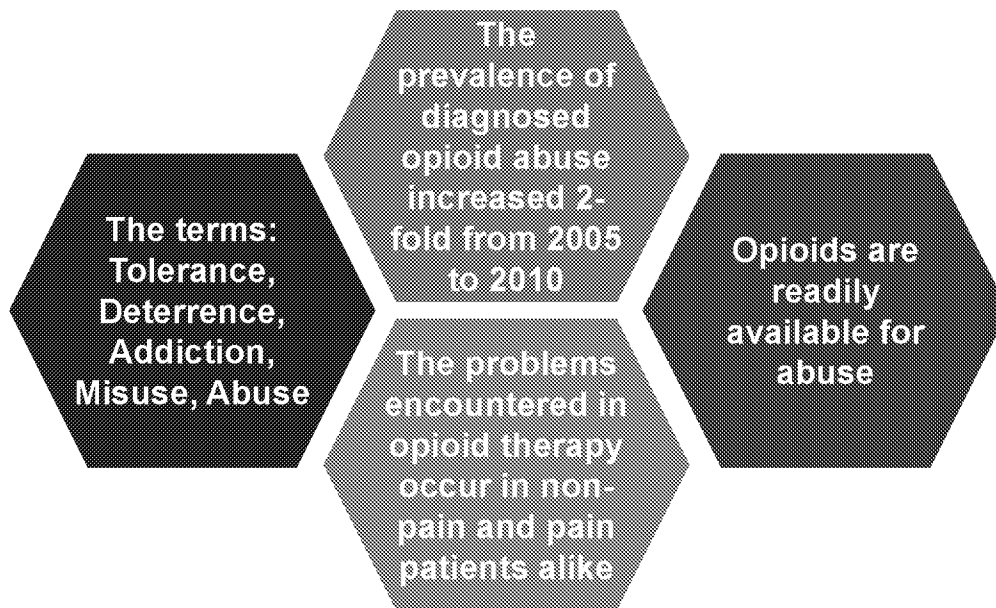
Misuse, abuse, and addiction occurs in pain and non-pain patients. However, the spectrum is different for pain patients vs non-pain patients. The spectrum of nonadherence in pain patients can be very complex. While the majority of patients may be strictly adherent, some misuse their prescription opioids by taking them other than as directed or indicated for a medical purpose. Still others may abuse their prescription opioids to chemically cope or may be further along the spectrum of more severe and consistent substance abuse or addiction.

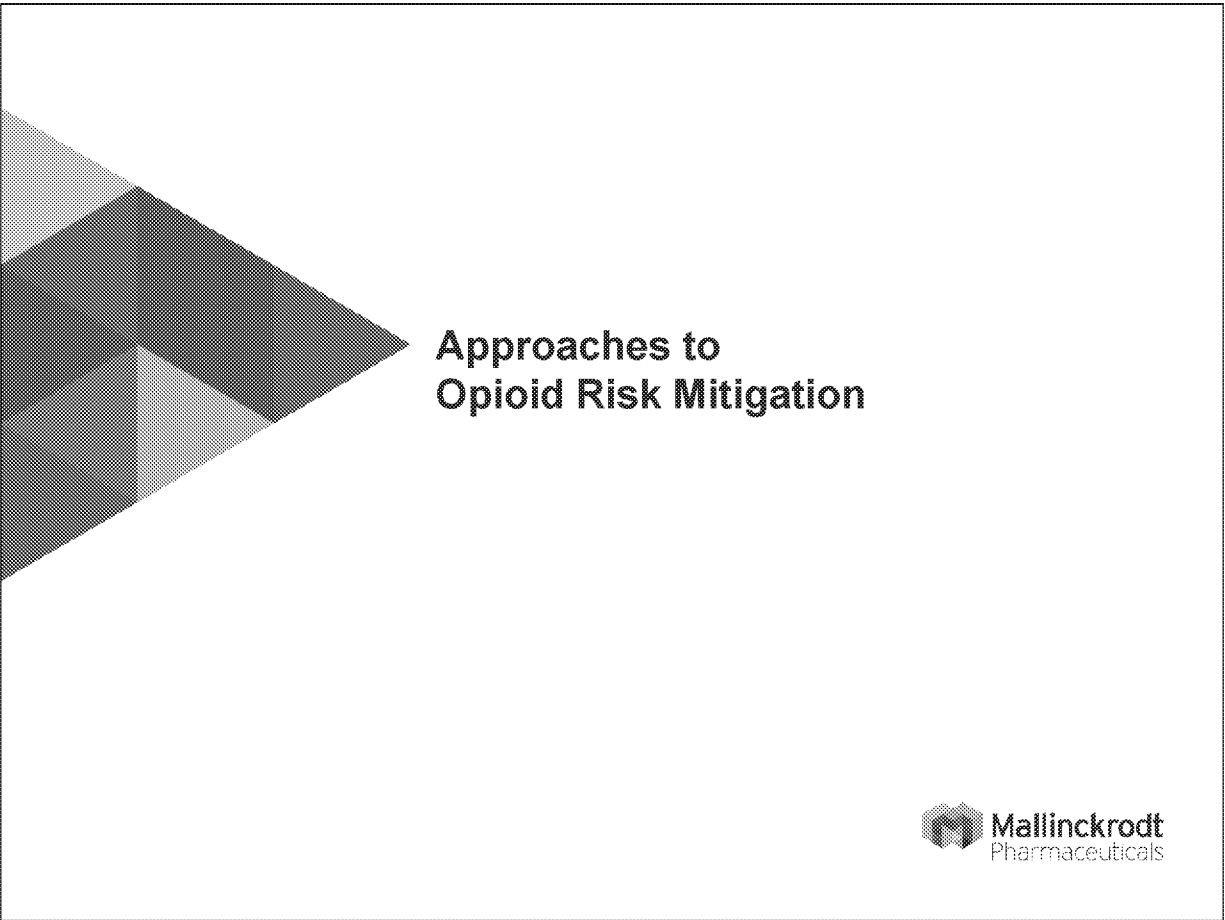
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Ref 1 page 2

## Summary





**All healthcare stakeholders need to focus on the challenge of opioid abuse risk mitigation**

The diagram consists of five hexagonal shapes arranged in a horizontal row. From left to right, they are labeled: Patients, Prescribers, Insurers, Industry, and Government (state and federal). These hexagons are interconnected and sit on a dark, textured base. Below the base, the text "Abuse Risk Mitigation" is written in white. In the top right corner of the slide, there is a small logo that looks like a stylized 'M' inside a hexagon.

**Abuse Risk Mitigation**

Bloomberg BusinessWeek  
**Opioid Painkiller Abuse Epidemic Spurs Search for Safe Drug<sup>1</sup>**  
"We are not wedded to any one way or the other to stop the abuse," Douglas Throckmorton, deputy director for regulatory programs at the FDA, said in a telephone interview. "What we want is abuse-deterrent formulations that work. We know how important this is."

1 Adams S. Opioid painkiller abuse epidemic spurs search for safe drug. *Bloomberg Businessweek*. July 2, 2013.

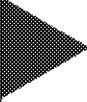
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All stakeholders need to be involved to tackle the challenge of opioid abuse risk mitigation; from patients on up to the government. This is everyone's problem, like Throckmorton said. We need everyone to be involved to solve the problem.

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1. Adams S. Opioid painkiller abuse epidemic spurs search for safe drug. Bloomberg Businessweek. July 2, 2013.





## Summary

**Approaches differ by stakeholder but all are responsible for reducing abuse**



► Prescribers<sup>1</sup>

- Evaluate the patient and household for risk
- Expanding risk management strategies from chronic to acute pain
- Limitations on tablets prescribed

► Industry<sup>1</sup>

- Abuse-deterrent technologies
- Educational programs
- Risk Evaluation and Mitigation Strategies (REMS)
- Suspicious order monitoring
- Drug take-back programs

► Patients and Families<sup>2</sup>

- Proper disposal
- Secure storage of opioids
- Self-medical use only
- No doctor shopping

► Government (State and Federal)<sup>3</sup>

- Labeling
- Scheduling
- Prescription Drug Monitoring Program (PDMP)
- REMS
- Anti-fraud squads

► Insurers<sup>4</sup>

- Pharmacy and Prescriber Controls
- Use of abuse deterrent formulations
- Surveillance of claims
- Cooperation of data sharing
- Anti-fraud squads

1. Coalition Against Insurance Fraud. Prescription for Peril: How Insurance Fraud Finances Theft and Abuse of Addictive Prescription Drugs: Coalition Against Insurance Fraud. Insight Series. December 2007. Available at: [www.insurancefraud.org/downloads/drugDiversion.pdf](http://www.insurancefraud.org/downloads/drugDiversion.pdf) Accessed September 30, 2013. 2. Food and Drug Administration. Questions and Answers: FDA approves a Risk Evaluation and Mitigation Strategy (REMS) for Extended-Release and Long-Acting (ER/LA) opioid analgesics. <http://www.fda.gov/Drugs/DrugSafety/InformationbyDrugClass/ucm309742.htm> July 9, 2012. Updated April 26, 2013. Accessed September 30, 2013. 3. Food and Drug Administration. Guidance for Industry: Assessment of abuse potential of drugs. [www.fda.gov/downloads/drugs/guidancecomplianceregulatoryinformation/guidances/ucm198650.pdf](http://www.fda.gov/downloads/drugs/guidancecomplianceregulatoryinformation/guidances/ucm198650.pdf) January 2010. Accessed September 30, 2013. 4. Katz NP, et al. Prescription opioid abuse: challenges and opportunities for payers. *Am J Manag Care*. 2013;19(4):295-302. 21

Given the scope of the opioid abuse problem, each stakeholder group has its own set of responsibilities. Approaches differ but all are interrelated and require cooperation among all stakeholders to successfully mitigate abuse risk.

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4. Katz NP, Birnbaum H, Brennan MJ, et al. Prescription opioid abuse: challenges and opportunities for payers. *Am J Manag Care*. 2013;19(4):295-302.

Ref 9 page 51

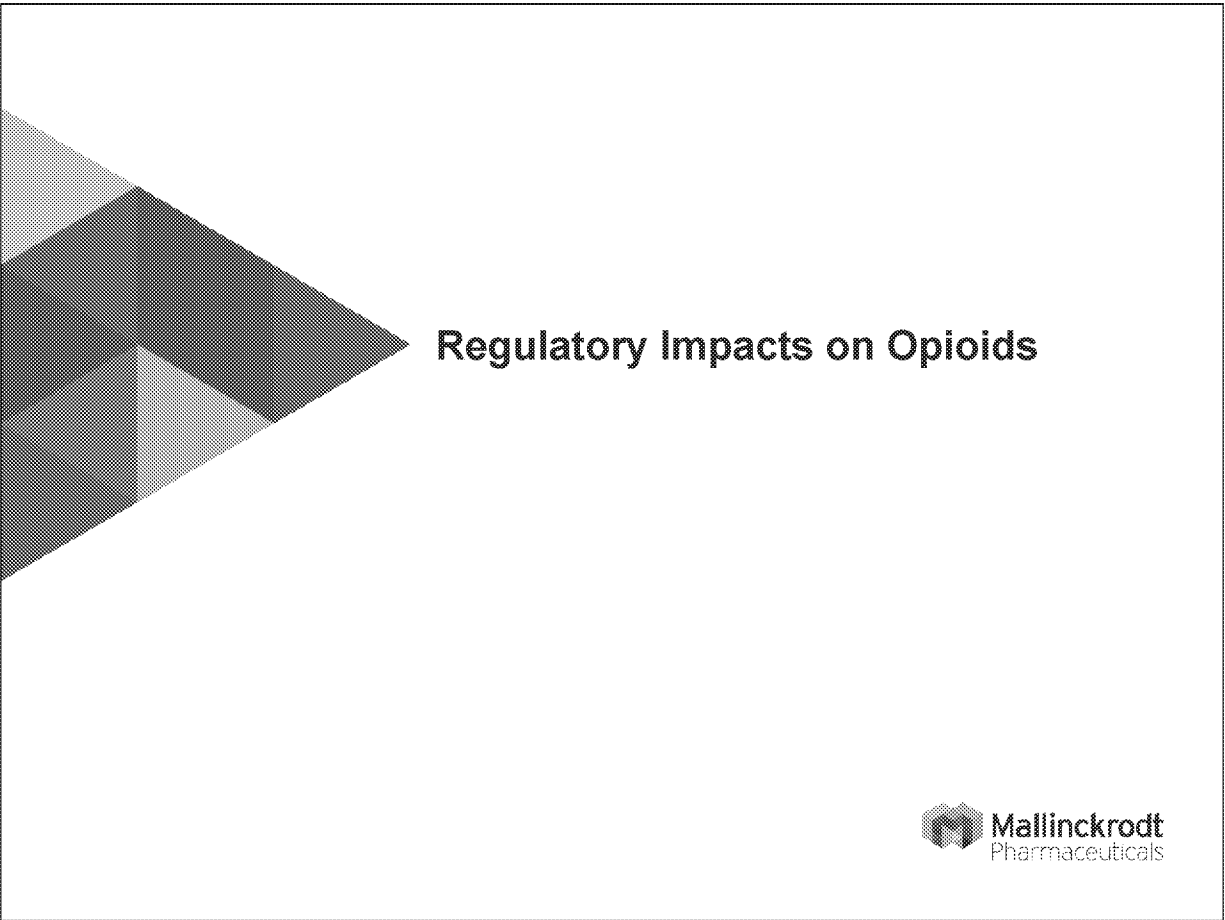
Ref 9 page 10

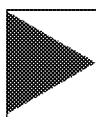
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Ref 29 page 22

Ref 30 page 3





 <b>The Government Is Working to Better Address Opioid Abuse</b>			
	National Level	AND	State Level
<b>CSA Schedule Changes</b>	<ul style="list-style-type: none"> <li>➤ Congress is considering the "Safe Prescribing Act of 2013," which would amend the federal Controlled Substances Act</li> <li>➤ The DEA and the FDA are currently attempting to reclassify hydrocodone combination products as Schedule II drugs through an administrative process               <ul style="list-style-type: none"> <li>➤ In January, the FDA's Drug Safety and Risk Management Advisory Committee voted 19 to 10 in favor of reclassifying hydrocodone-containing compounds</li> </ul> </li> </ul>		<ul style="list-style-type: none"> <li>➤ The Oklahoma Legislature passed a bill on May 16, 2013, banning refills on prescriptions for hydrocodone products. The law will go into effect on November 1, 2013.</li> <li>➤ New York State reclassified hydrocodone as a schedule II controlled substance effective February 23, 2013.</li> </ul>
<b>REMS</b>	<ul style="list-style-type: none"> <li>➤ On July 9, 2012, FDA approved ER/LA opioid analgesic REMS</li> <li>➤ On December 28, 2011, FDA approved TIRF REMS</li> </ul>		
<b>PDMPs</b>			<ul style="list-style-type: none"> <li>➤ California is considering imposing a tax on manufacturers to fund its PDMP.</li> </ul>
<b>Labeling</b>	<ul style="list-style-type: none"> <li>➤ On September 10, 2013, FDA announced classwide safety labeling changes and new postmarket study requirements for all ER/LA opioid analgesics</li> </ul>		
<b>Abuse-Deterrence</b>	<ul style="list-style-type: none"> <li>➤ On January 9, 2013, the FDA issued a draft guidance document to assist industry in developing new formulations of opioid drugs with abuse-deterrent properties</li> </ul>		<ul style="list-style-type: none"> <li>➤ Several states (NY, NJ, PA, TX) are considering legislation to block generic substitution of non-abuse-deterrent generics.</li> </ul>

CSA = Controlled Substance Act; DEA = Drug Enforcement Agency; FDA = Food and Drug Administration; REMS = Risk Evaluation and Mitigation Strategy; APAP = acetaminophen; ADF = abuse-deterrent formulation; PDMP = prescription drug monitoring program; TIRF = transmucosal immediate-release fentanyl.

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At the national and state levels, there are several initiatives in place, including: Controlled Substance Act (CSA), abuse deterrence, REMS and PDMPs. The US Congress, Drug Enforcement Agency, and Food and Drug Administration are currently considering changes to reclassify hydrocodone products as class II substances.<sup>1</sup> New York State has already accomplished this.<sup>2</sup> In Oklahoma, prescriptions for hydrocodone products may not be refilled as of November 1, 2013.<sup>3</sup> On a national level, in 2011 the White House announced a comprehensive plan designed to address the public health impact of misuse and abuse of prescription pain medications.<sup>4,5</sup> The FDA issued new Industry Guidance for Abuse-Deterrent Opioids – Evaluation and Labeling.<sup>6</sup> Manufacturers of long-acting and extended-release opioid formulations are required to provide a Risk Evaluation and Mitigation Strategy (REMS).<sup>4,5</sup> State Prescription Drug Monitoring Programs (PDMPs) have been expanded.<sup>4,5</sup> Also in 2011, the FDA requested manufacturers to limit the unit dose of acetaminophen to 325 mg.<sup>7</sup> In 2012, Washington State instituted a requirement for physicians to refer chronic pain patients taking high doses of opioids for evaluation by pain specialists.<sup>8</sup> New York State requires that physicians consult the PDMP database prior to prescribing controlled substances to identify "doctor-shoppers."<sup>9</sup>

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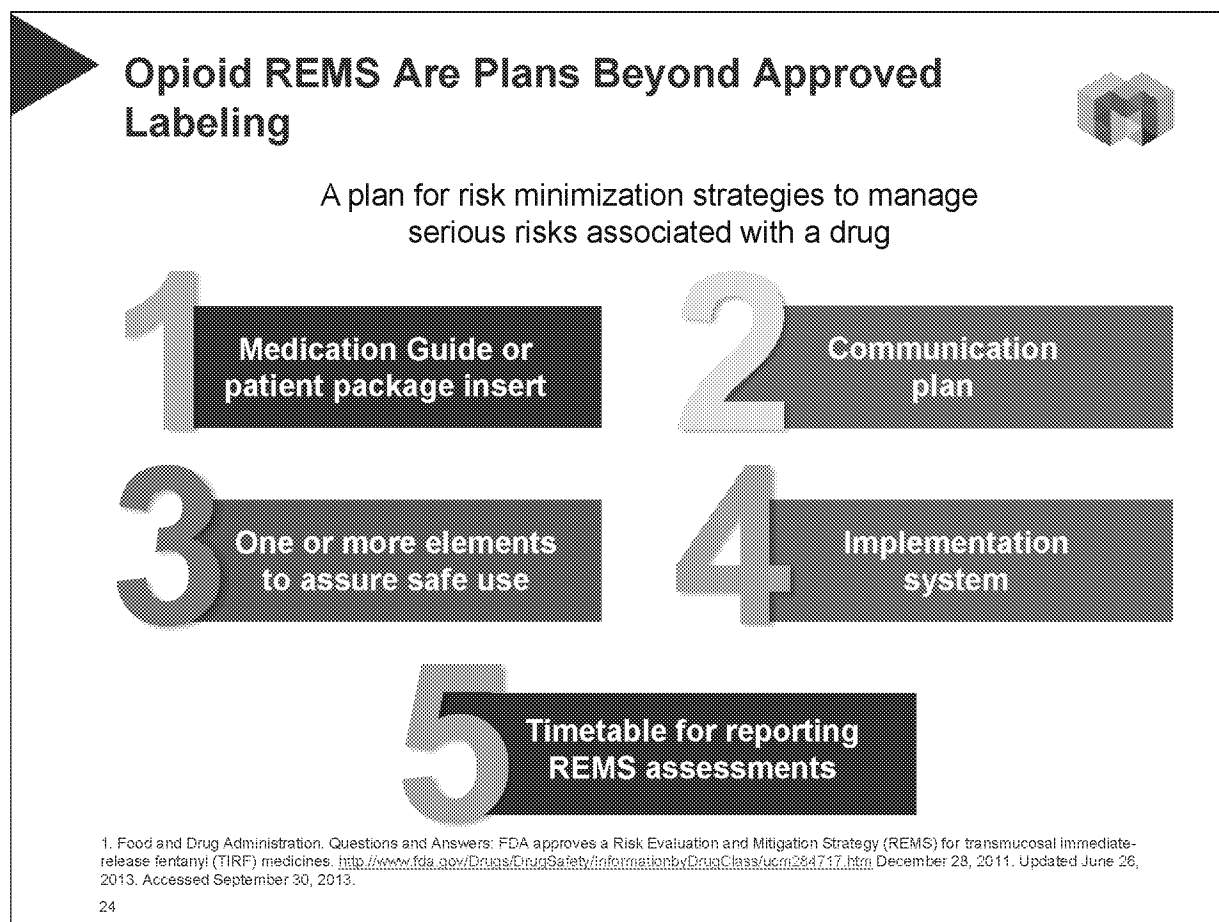
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AAPM, 2013 p.1 A



A Risk Evaluation and Mitigation Strategy (REMS) is a risk management plan that employs strategies to minimize risk beyond approved labeling, in order to manage serious risks that are associated with a drug. Under the FDA Amendments Act of 2007, the FDA is granted the authority to require manufacturers to develop a REMS when the FDA finds that a REMS program is necessary to ensure that a drug's benefits outweigh its risks. A REMS can include a Medication Guide or patient package insert, communication plan, at least one or more components to assure safe use, an implementation system and a timetable for submission of the REMS assessments.

#### References

1. Food and Drug Administration. Questions and Answers: FDA approves a Risk Evaluation and Mitigation Strategy (REMS) for transmucosal immediate-release fentanyl (TIRF) medicines.  
<http://www.fda.gov/Drugs/DrugSafety/InformationbyDrugClass/ucm284717.htm> December 28, 2011. Updated June 26, 2013. Accessed September 30, 2013.

REMS is a risk management plan that uses risk minimization strategies beyond approved labeling to manage serious risks associated with a drug. Under the Food and Drug Administration Amendments Act of 2007, FDA has the authority to require a manufacturer to develop a REMS when FDA finds a REMS is necessary to ensure that the benefits of a drug outweigh its risks.

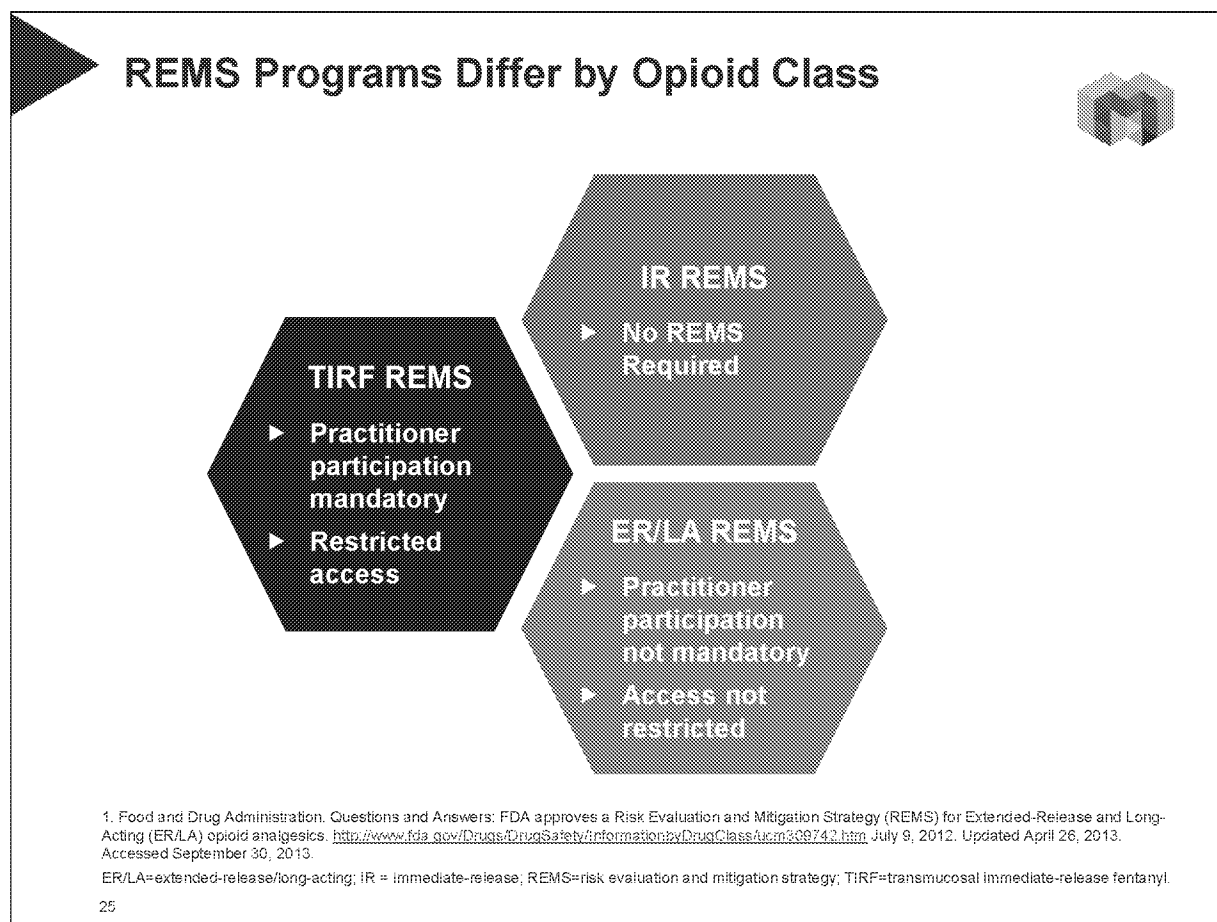
A REMS can include a Medication Guide or patient package insert, communication plan, one or more elements to assure safe use, an implementation system, and a timetable for submission of the REMS assessments

Food and Drug Administration. <http://www.fda.gov/Drugs/DrugSafety/InformationbyDrugClass/ucm284717.htm>. Accessed September 6, 2013.

TIRF REMS p2 answer to Q2

TIRF REMS p2 answer to Q2

TIRF REMS p2 answer to Q2



REMS programs differ by class of opioid medication. Transmucosal immediate release fentanyl drugs are indicated for the management of breakthrough pain in cancer patients.<sup>1</sup> To make it easier for healthcare providers, the FDA agreed to a single, shared-access risk evaluation and mitigation strategy for all drugs in the TIRF class. Healthcare providers who prescribe TIRF medicines for outpatient use are required to enroll in the TIRF REMS Access program. Prescribers will be required to re-enroll in the TIRF REMS program every 2 years from the date of enrollment into the TIRF REMS or from the date of enrollment into the individual REMS, whichever comes first. Patients who are prescribed TIRFs as outpatients are required to sign a Patient–Prescriber Agreement with their healthcare provider and will be asked to read the Medication Guide provided to them by their prescriber. Only outpatient and inpatient pharmacies that dispense TIRF medicines are required to enroll in the TIRF REMS Access program. Under the new class REMS, prescribers, pharmacies, distributors, and outpatients will need to enroll in only 1 REMS program — the TIRF REMS Access program — to prescribe, dispense, or receive all drugs in the TIRF medicines class.

REMS required for extended-release/long-acting opioids are less stringent than those for TIRF. Manufacturers are required to fund continuing medical education programs for practitioners and to provide patient counseling materials.<sup>2</sup> However, the ER/LA opioid analgesics REMS training program will not include a mandatory requirement linked to allowing healthcare professionals to prescribe ER/LA opioid analgesics.

Because immediate release formulations contain smaller amounts of drug, there is no REMS requirement for these agents.<sup>2</sup>

#### References

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for transmucosal immediate-release fentanyl (TIRF) medicines.

<http://www.fda.gov/Drugs/DrugSafety/InformationbyDrugClass/ucm284717.htm> December 28, 2011. Updated June 26, 2013. Accessed September 30, 2013.

Food and Drug Administration. Questions and Answers: FDA approves a Risk Evaluation and Mitigation Strategy (REMS) for Extended-Release and Long-Acting (ER/LA) opioid analgesics.

<http://www.fda.gov/Drugs/DrugSafety/InformationbyDrugClass/ucm309742.htm> July 9, 2012. Updated April 26, 2013. Accessed September 30, 2013.

Food and Drug Administration. <http://www.fda.gov/Drugs/DrugSafety/InformationbyDrugClass/ucm284717.htm>. Accessed September 5, 2013.

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TIRF REMS p2 answer to Q1

TIRF REMS p2 answer to Q3

TIRF REMS p3 answer to Q6

TIRF REMS p4 answer to Q8

TIRF REMS p3 answer to Q7

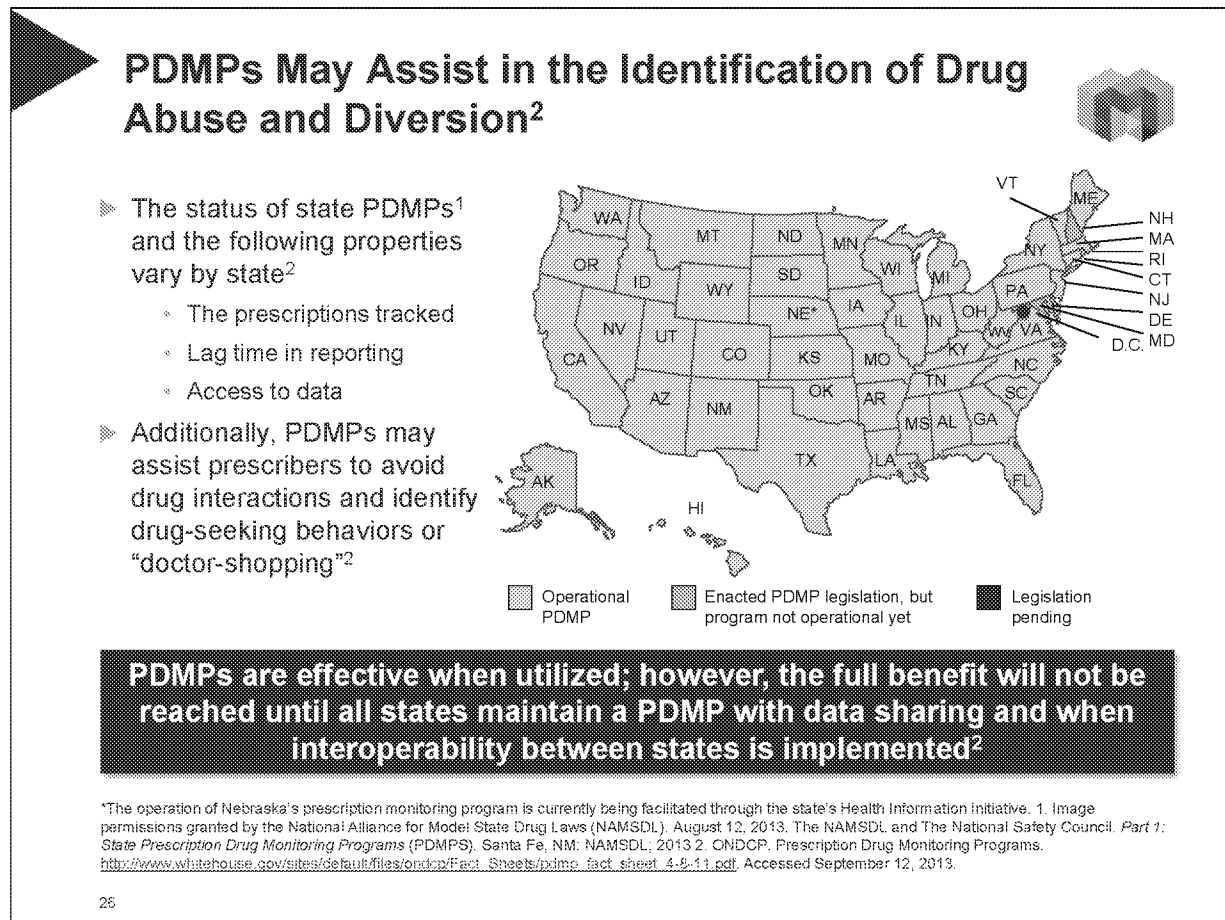
TIRF REMS p2 answer to Q3

ER/LA REMS p1 A

ER/LA REMS p 3 answer to Q5

ER/LA REMS p4 answer to Q5 para 2 &3





The majority of the states have active PDMPs that may assist in the identification of drug abuse and diversion, with the rest to follow. The status of PDMPs varies by state and by the prescriptions tracked, lag time in reporting of information, and access to data. PDMPs may provide an additional benefit to prescribers in providing information to avoid drug interactions and identify patients with drug-seeking or “doctor-shopping” behaviors. Unfortunately, the full benefit of these programs may not be realized until information can be communicated between states with PDMPs.

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American Academy of Pain medicine. <http://www.painmed.org/advocacy/remis/opioid-risk-evaluation-and-mitigation-strategies-remis-update/>

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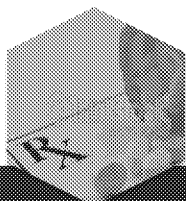
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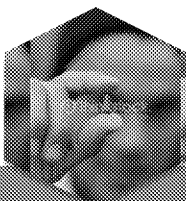


**The FDA recently announced required labeling changes<sup>1</sup>**

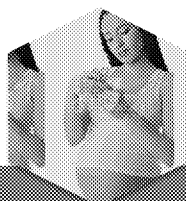
► New language aims to help healthcare professionals tailor their prescribing decisions based on a patient's individual needs



ER/LA opioids are indicated for the management of pain severe enough to require daily, around-the-clock, long-term opioid treatment and for which alternative treatments are inadequate



These drugs should be reserved for use in patients for whom alternative treatment options (eg, non-opioid analgesics or immediate-release opioids) are ineffective, not tolerated, or would be otherwise inadequate to provide sufficient management of pain



A new boxed warning on ER/LA opioid analgesics to caution that chronic maternal use of these products during pregnancy can result in neonatal opioid withdrawal syndrome

► **Reservation for specific patients further addresses the risks of addiction, abuse, and misuse, even at recommended doses, and the greater risks of overdose and death**

- \* ER/LA opioid analgesics are not indicated for as-needed pain relief

1. Food and Drug Administration. FDA announces safety labeling changes and postmarket study requirements for extended-release and long-acting opioid analgesics <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm367726.htm> September 10, 2013. Accessed September 30, 2013.


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In order to facilitate better prescribing of ER/LA opioids, the FDA required changes to labeling based on the needs of the individual patient. New labeling requirements for ER/LA products address the following: the management of pain sufficiently severe to require 24-hour continuous long-term opioid treatment for which alternative treatment is inadequate; patients for whom alternative treatment is ineffective, not tolerated or would be otherwise inadequate; chronic maternal use of ER/LA opioids during pregnancy. Further labeling requirements address the risks of addiction, abuse and misuse, even at recommended doses, the greater risks of overdose and death, and the fact that ER/LA opioids are not indicated for PRN prescribing.

#### References

1. Food and Drug Administration. FDA announces safety labeling changes and postmarket study requirements for extended-release and long-acting opioid analgesics <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm367726.htm> September 10, 2013. Accessed September 30, 2013.

Ref 28 page 1



## Post-Market Study Requirements for ER/LA Opioids Are Also Mandated by the FDA<sup>1</sup>

**Post-market study requirements**

Recognizing that **more information is needed** to assess the serious risks associated with **long-term use of ER/LA opioids**, the FDA is requiring the drug companies that make these products to **conduct further studies and clinical trials**

► The goals of these post-market requirements are to further assess the known serious risks of:

**Misuse**      **Overdose**      **Abuse**

Increased sensitivity to pain (hyperalgesia)

**Addiction**      **Death**

Food and Drug Administration. FDA announces safety labeling changes and postmarket study requirements for extended-release and long-acting opioid analgesics <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm367726.htm> September 10, 2013. Accessed September 30, 2013.

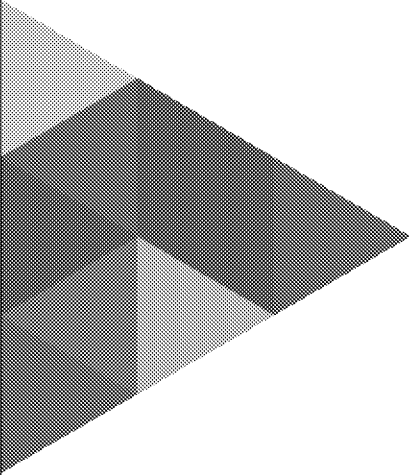
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The FDA will also require the continued study and conducting of clinical trials on ER/LA opioids after they have begun to be marketed, realizing that more information is needed to assess the full effects of long-term use. The purpose of these studies is to assess the risks of misuse, overdose, abuse, hyperalgesia and addiction, and to assess opioid-related death.

#### References

Food and Drug Administration. FDA announces safety labeling changes and postmarket study requirements for extended-release and long-acting opioid analgesics <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm367726.htm> September 10, 2013. Accessed September 30, 2013.


Ref 28 page 1

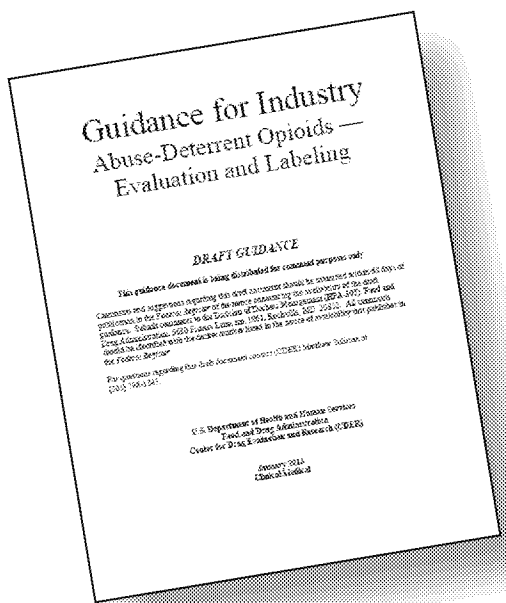


## **Regulatory Impacts on Opioids: Abuse-Deterrent Formulations**

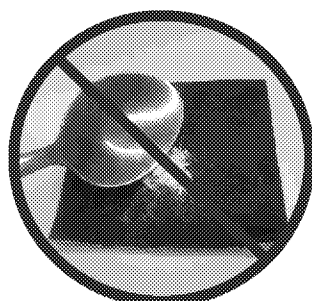


# FDA-Issued Guidance on Abuse-Deterrent Opioids in January 2013<sup>1</sup>





- Goal is to clarify confusion caused by rapidly changing science<sup>2</sup>
- Attempt to develop consistent labeling language for abuse deterrence<sup>2</sup>



1. FDA News Release. FDA issues draft guidance on abuse-deterrent opioids. <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm334785.htm>, January 9, 2013. Accessed September 30, 2013.

2. Food and Drug Administration. Guidance for Industry: Abuse-Deterrent Opioids – Evaluation and Labeling. January 2013. Available at: <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm334785.htm> Accessed September 30, 2013.

30

In January 2013, the FDA issued industry guidance regarding the development of opioid formulations that are more difficult to abuse or misuse.<sup>1</sup>

Abuse-deterrent formulations, as the name implies, make abuse more difficult. Recently, the FDA released a guidance statement pertaining to the evaluation and labeling of certain abuse deterrent formulations.<sup>2</sup> Tamper-resistant formulations, for example, are designed to prevent destruction of controlled-release properties that would otherwise allow snorting or injection of more potent drug that is also more likely to be lethal. Other formulations utilize the addition of an antagonist to reduce euphoria; one of the main addictive properties of opioids. The addition of noxious substances to a drug is another method to prevent abuse. The use of a prodrug that requires metabolism to become active is another deterrent methodology that can be employed. Depot formulations by design release drug more slowly through, for example, intramuscular injection.

#### References

1. FDA News Release. FDA issues draft guidance on abuse-deterrent opioids. <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm334785.htm>. January 9, 2013. Accessed September 30, 2013.
2. Food and Drug Administration. Guidance for Industry: Abuse-Deterrent Opioids – Evaluation and Labeling. January 2013. Available at: <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm334785.htm> Accessed September 30, 2013.

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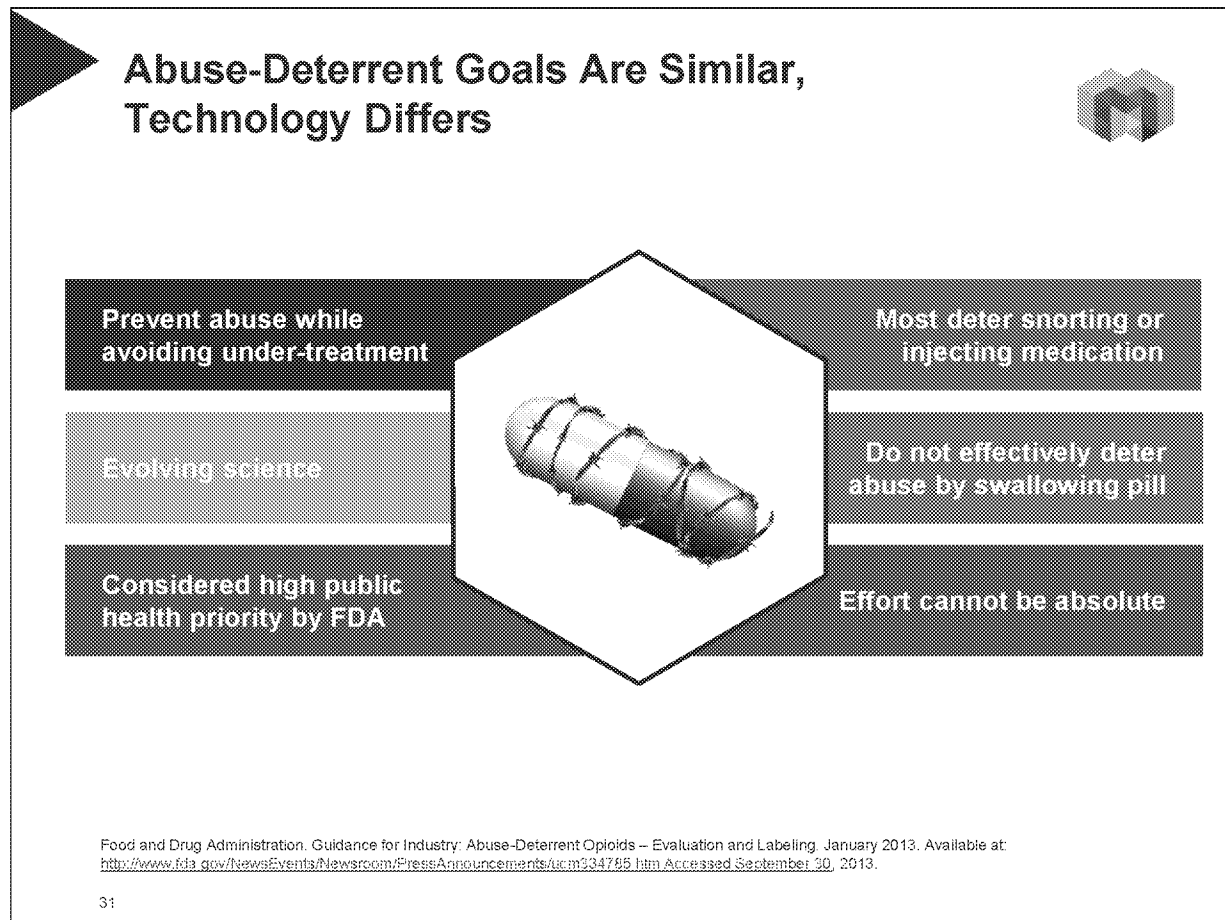
<http://www.hcplive.com/publications/pain-management/2011/december-2011/Abuse-deterrent-Technologies-in-Opioid-Medications-A-New-Weapon-in-the-Fight-against-Misuse-and-Abuse>

Food and Drug Administration. Guidance for industry: Abuse-Deterrent opioids – evaluation and labeling. January 2013.

FDA 2013 p.2 L71-96

Could not find explicit mention

FDA 2013 Title page



The objective of abuse deterrence is to prevent abuse without jeopardizing access to adequate pain relief. The science and technology are in their early stages of development. Although the FDA sees abuse as a public health problem, its guidance for industry is flexible to accommodate the evolving science.

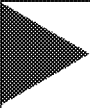
Most abuse-deterrent technologies are designed to make it more difficult for medications to be abused using unintended routes of administration such as snorting or injection. However, oral administration represents the most widely used method of abuse, according to our research on oxycodone. Existing technologies do not deter individuals from swallowing multiple tablets or capsules to achieve a euphoric state.

#### References

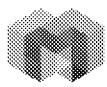
Food and Drug Administration. Guidance for Industry: Abuse-Deterrent Opioids – Evaluation and Labeling. January 2013. Available at: <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm334785.htm> Accessed September 30, 2013.

#### Example image:

<http://www.hcplive.com/publications/pain-management/2011/december-2011/Abuse-deterrent-Technologies-in-Opioid-Medications-A-New-Weapon-in-the-Fight-against-Misuse-and-Abuse>  
Industry guidance, p 1 L25-28



## Six Approaches to Formulation



- Physical, chemical barriers
- Antagonists
- Aversion
- Delivery system
- Prodrug
- Combination of approaches

Food and Drug Administration. Guidance for Industry: Abuse-Deterrent Opioids – Evaluation and Labeling. January 2013. Available at: <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm334785.htm> Accessed September 30, 2013

32

There are 5 approaches to developing abuse deterrent formulations, with the sixth being a combination of approaches.

The approaches to developing abuse deterrent formulations are:

Physical or chemical barriers to extraction of large volumes of opioids

Addition of antagonists that blunt the euphoria that is one of the main addictive properties of opioids

Addition of noxious substances to make ingestion aversive

Development of delivery systems, including depot injectable formulations and implants — certain drug-release designs or the method of drug delivery can offer resistance to abuse

Development of prodrugs that require physiological conversion to become active

Use of more than one approach at a time

#### References

Food and Drug Administration. Guidance for Industry: Abuse-Deterrent Opioids – Evaluation and Labeling. January 2013. Available at: <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm334785.htm> Accessed September 30, 2013.

Example image:

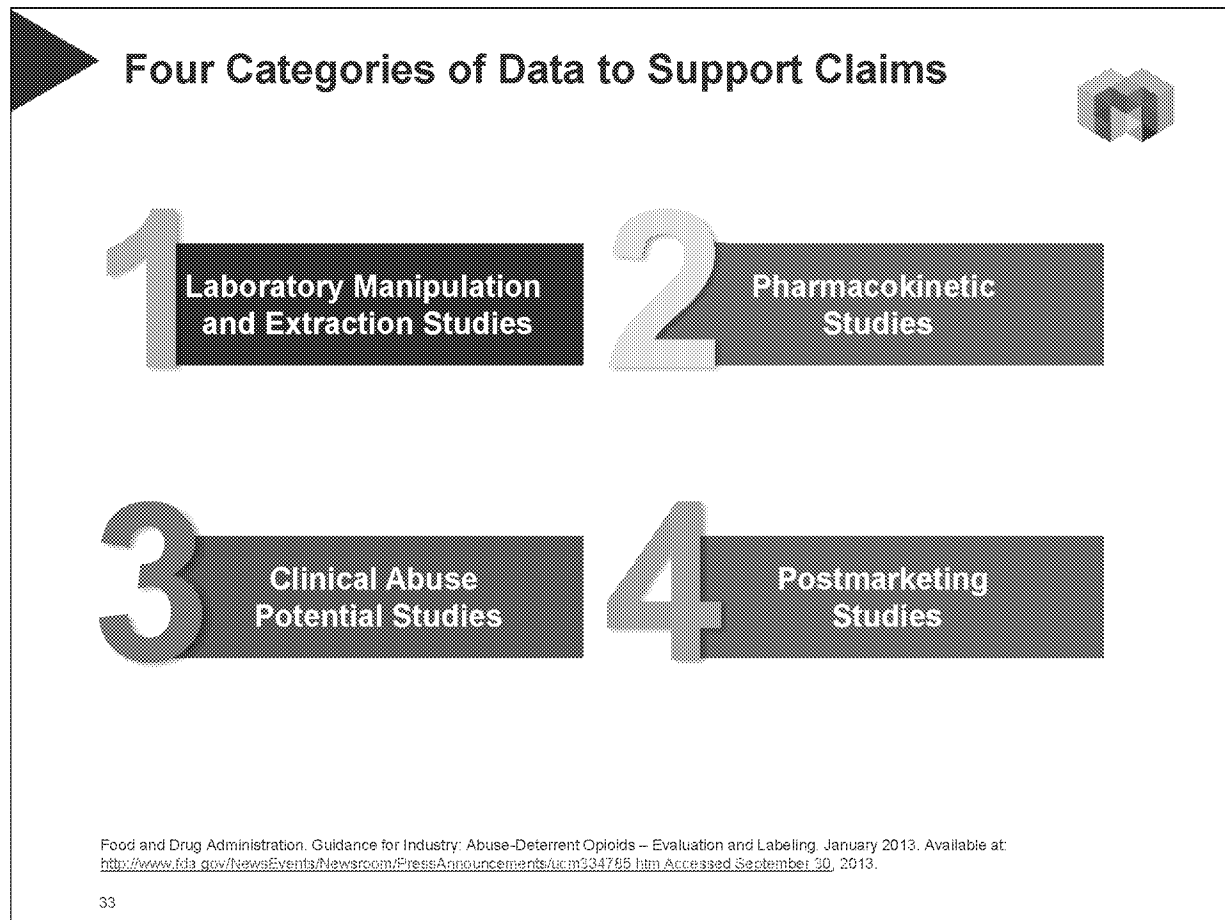
<https://www.learntogether.org.uk/Topics/Curriculum/Pages/Science.aspx>

Abuse deterrent guidance p 2 Section III

Food and Drug Administration. Guidance for industry: Abuse-Deterrent opioids – evaluation and labeling. January 2013.

Abuse deterrent guidance p 2 Section III





It is important to recognize that the first 3 categories of evidence can be completed prior to going to market. They demonstrate abuse liability in controlled conditions. Category 4 is always a postmarketing evaluation to assess the potential for abuse in real-world settings.

#### References

Food and Drug Administration. Guidance for Industry: Abuse-Deterrent Opioids – Evaluation and Labeling. January 2013. Available at: <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm334785.htm> Accessed September 30, 2013.

Example image:

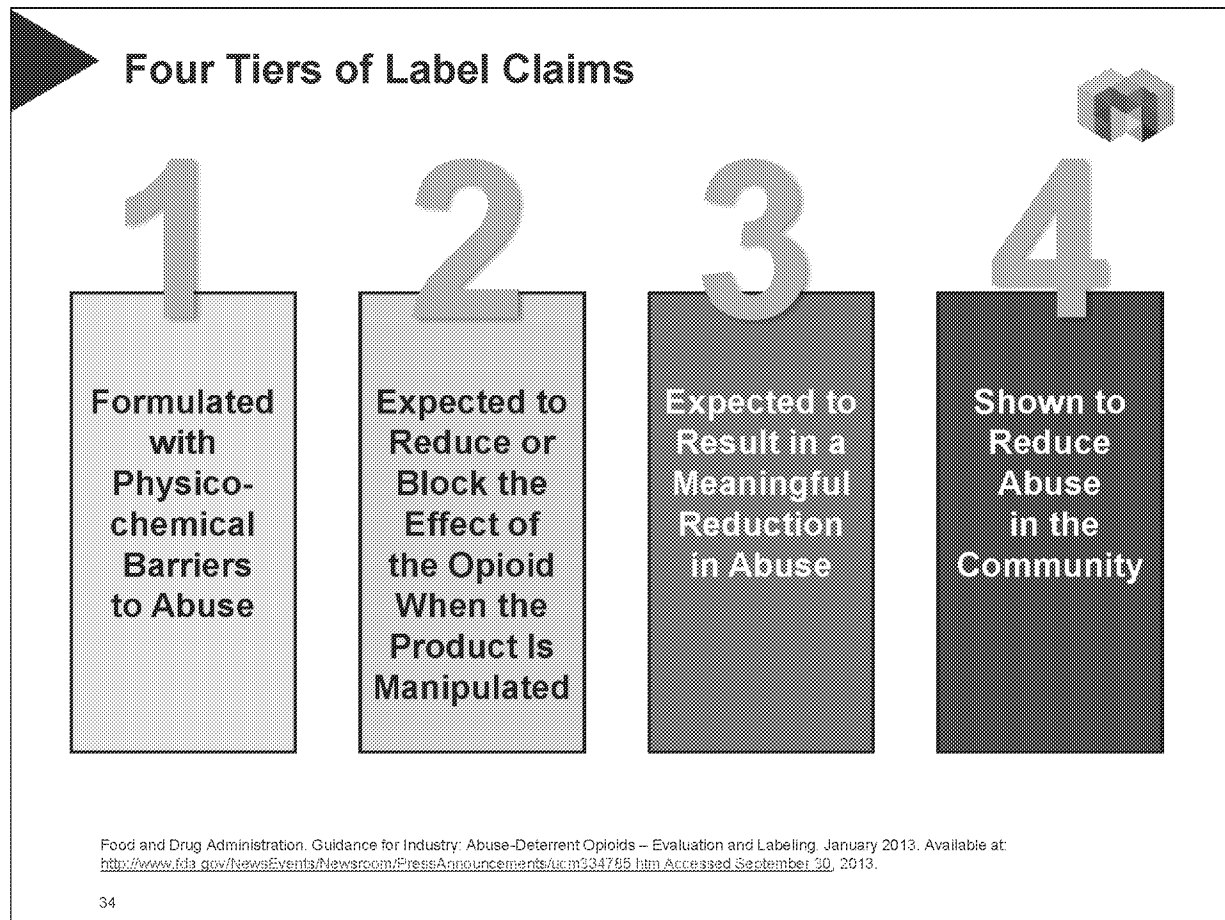
<https://www.learntogether.org.uk/Topics/Curriculum/Pages/Science.aspx>

Abuse deterrent guidance p 2 L113-122

p. 13 L524-538

Food and Drug Administration. Guidance for industry: Abuse-Deterrent opioids – evaluation and labeling. January 2013.



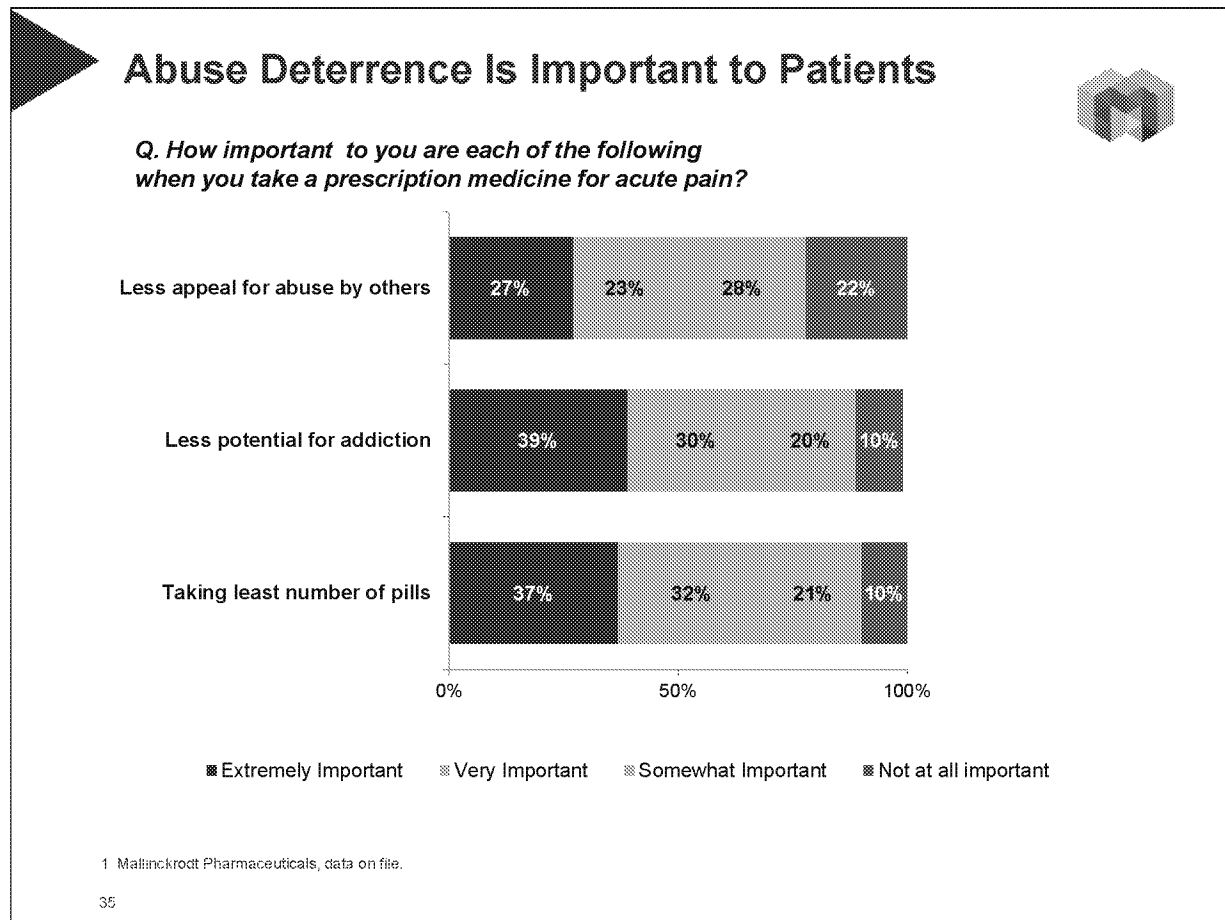


The 4 tiers of claims for abuse deterrence correlate with the categories of data to support the claims. However, the FDA generally expects data from categories 1 and 2 (and sometimes category 3) to substantiate a Tier 1 claim. Tier 4, demonstrated reduced abuse in the community, is a claim based on real-world, postmarketing experience.

#### References

Food and Drug Administration. Guidance for Industry: Abuse-Deterrent Opioids – Evaluation and Labeling. January 2013. Available at: <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm334785.htm> Accessed September 30, 2013.

Food and Drug Administration. Guidance for industry: Abuse-Deterrent opioids – evaluation and labeling. January 2013.  
Abuse deterrent guidance p 18 L707-721  
Abuse deterrent guidance p 18 L707-721



The importance of abuse deterrence in pain medications is supported by the perceptions of patients. Less potential for addiction was extremely/very important for 39% of surveyed patients, almost the same percentage of whom ranked taking the least number of pills as extremely/very important.

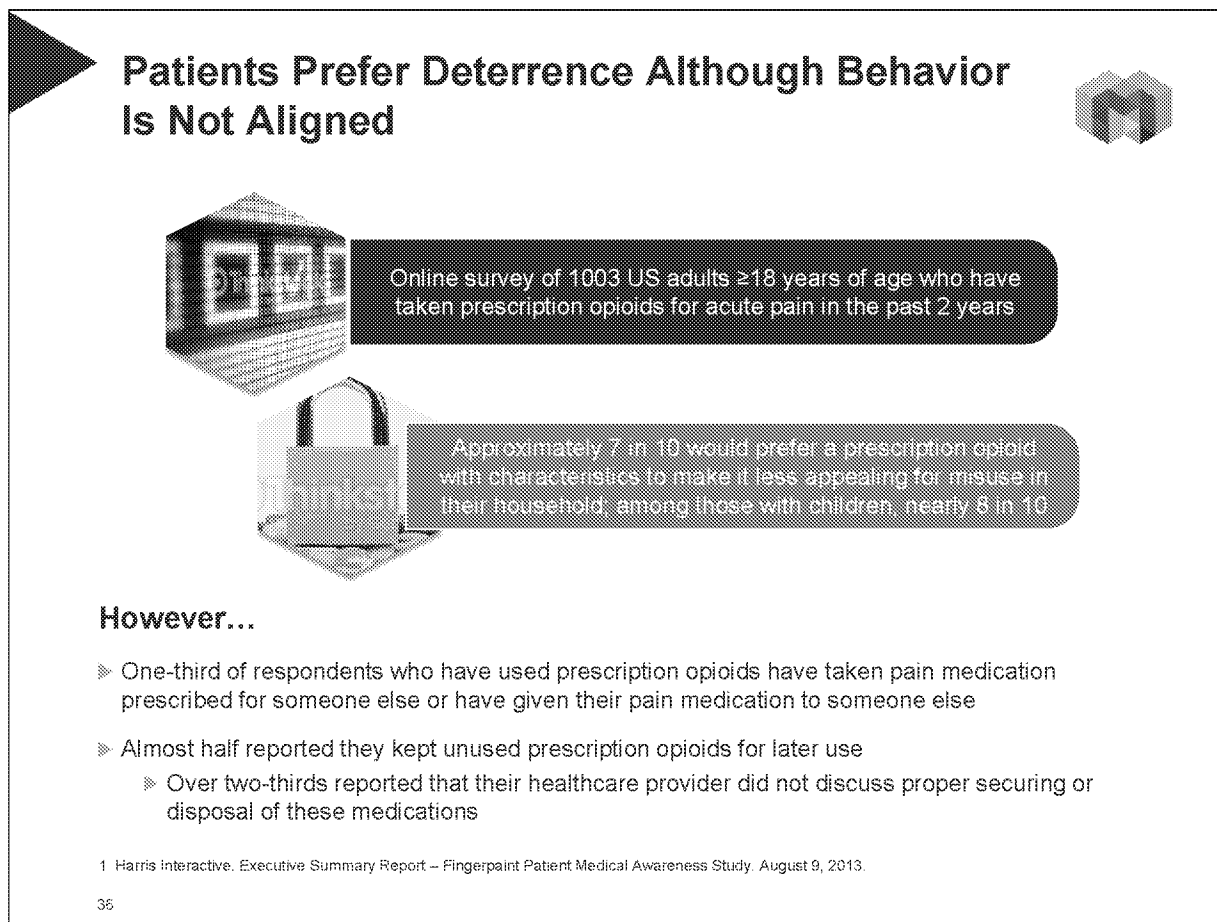
Sixty-nine percent of surveyed patients strongly/somewhat agree that they would prefer a prescription pain medicine with characteristics that made it less appealing for misuse in their household.

#### References

1. Mallinckrodt Pharmaceuticals, data on file.

Omnibus Patient survey. Slide 10

Mallinckrodt Pharmaceuticals, data on file.



A very recent online survey was conducted from July 18 to July 29, 2013 of 1003 US adults ≥18 years of age who have taken prescription opioids for acute pain in the past 2 years. Interestingly, a majority of those surveyed (70-80%) expressed a desire to guard others in their household against drug misuse, while a significant percentage of participants, one-third, have also taken pain medication prescribed for someone else, or given their pain medication to someone else. Almost half admitted keeping their unused prescription opioids for later use and over two-thirds reported not having a discussion with their healthcare provider regarding securing or disposal of these medications.

#### References

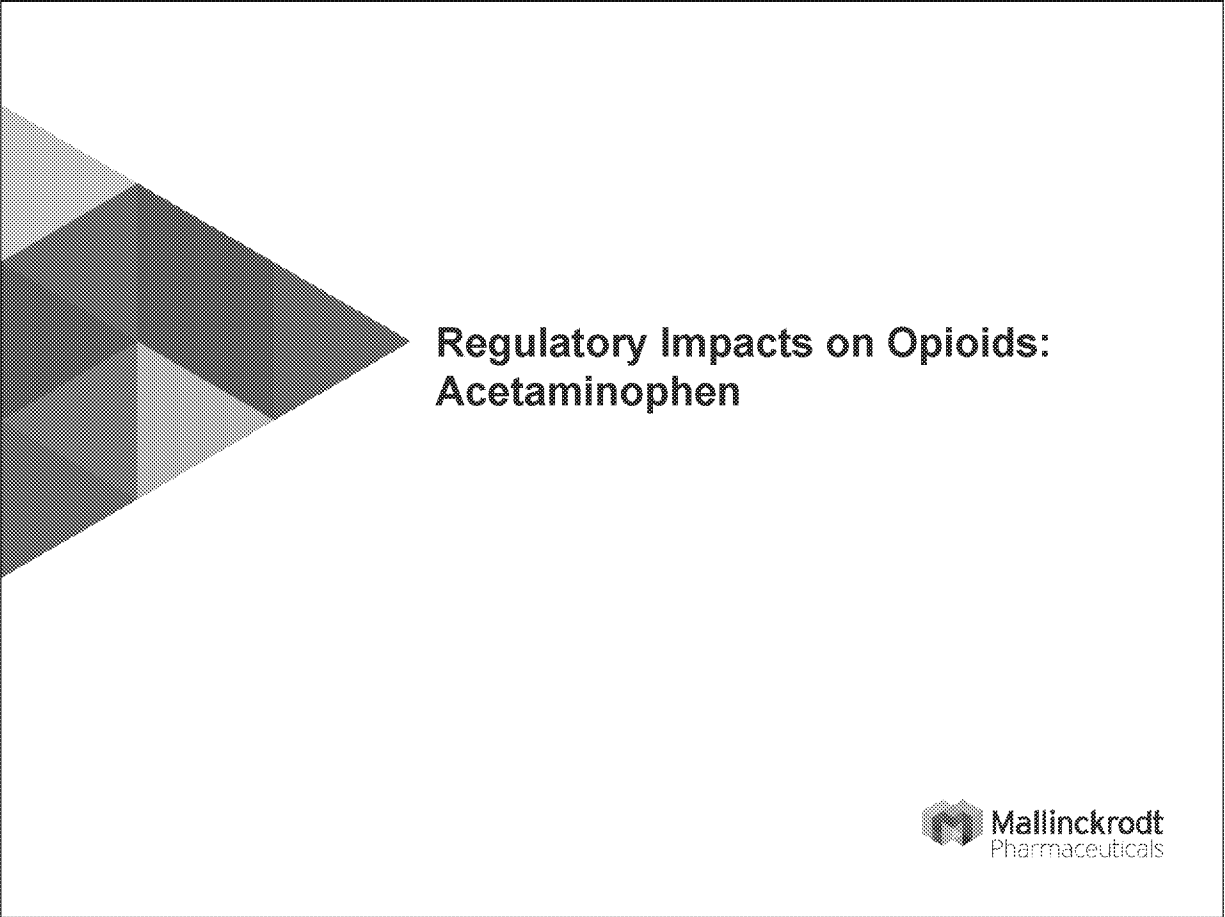
1. Harris Interactive. Executive Summary Report – Fingerprint Patient Medical Awareness Study. August 9, 2013.

## Summary



- Changes have been proposed to lower the maximum dose of acetaminophen and to potentially ban combination acetaminophen products
- Regulations have been promulgated clarifying abuse-deterrent opioid-formulation claims
- Abuse-deterrent formulations attempt to reduce abuse while avoiding under-treatment





## Acetaminophen Use for Pain



### TEXT TO BE REDUCED AND PRESENTED CREATIVELY

- ▶ More than 200 million acetaminophen-containing prescriptions are dispensed annually in the United States, usually in an opioid combination
- ▶ Maximum therapeutic dose established through FDA monograph process for nonprescription medications
  - ▶ In separate actions of 1977 and 1988 actions, 3900-4000 mg maximum daily dosage was established
- ▶ After multiple meetings, FDA suggested (not mandated) reducing maximum daily dosage to 3000–3250 mg
- ▶ Tylenol® (acetaminophen, McNeil-PPC) voluntarily reduced maximum daily dose of 500 mg tablet to 6 tablets/day
- ▶ In 2011, McNeil pledged to change 325 mg tablet labeling to reflect 3250 mg/day maximum dosage (10 tablets)

<sup>1</sup> Krenzelok EP. *Drugs RD* 2012;12(2):45-48

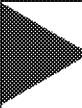
39

Long recognized as a safe and effective antipyretic and analgesic, acetaminophen is also associated with significant hepatotoxicity if taken inappropriately in excess of its recommended dosage. As explained above, for years the established maximum daily acetaminophen dosage stood at 4000 mg per day; however, the manufacturer of Tylenol® brand acetaminophen, McNeil, changed its labeling to reflect the new maximum dosage recommended by the FDA.


Generic manufacturers have remained consistent with the established monograph dosing and have not changed the dosing on their labels. It is inevitable that a great deal of confusion will result among both healthcare professionals and consumers about what is the correct and appropriate maximum daily acetaminophen dose.

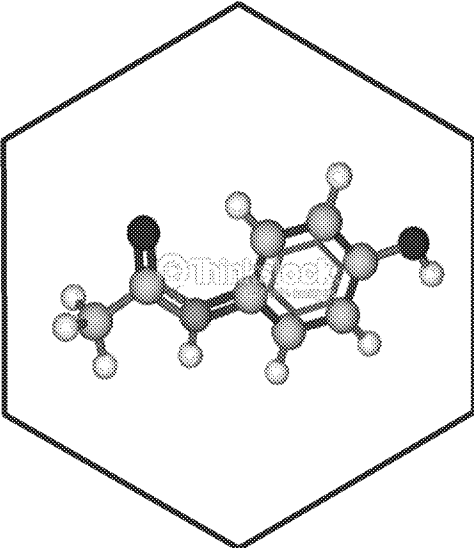
#### References

1. Krenzelok EP, Royal MA. Confusion: acetaminophen dosing changes based on NO evidence in adults. *Drugs R D*. 2012;12(2):45-48.



## FDA and Acetaminophen in Prescriptions





- **Tablet Limitations**
  - Effective January 2014
  - Limit acetaminophen combination products to ≤325 mg in each tablet or capsule
- **Label Changes**
  - Boxed Warning for potential severe liver injury for all products
  - Warning for potential allergic reactions and skin reactions for all products

1. Schilling A, et al. *Cleve Clin J Med*. 2010;77(1):19-27.

2. FDA Drug Safety Communication: prescription acetaminophen products to be limited to 325 mg per dosage unit, boxed warning will highlight potential for severe liver failure. <http://www.fda.gov/Safety/MedWatch/SafetyInformation/SafetyAlertsforHumanMedicalProducts/ucm239955.htm> January 13, 2011. Accessed September 30, 2013.

3. Food and Drug Administration. Questions and Answers: FDA warns of rare but serious skin reactions with the pain reliever/fever reducer acetaminophen. <http://www.fda.gov/Drugs/DrugSafety/ucm363041.htm> August 1, 2013. Updated August 12, 2013. Accessed September 30, 2013.

40

Although acetaminophen is generally regarded as safe, in 2006, approximately 140,000 acetaminophen overdoses were reported in the United States. As many as half of these events were unintentional.<sup>1</sup> Part of the reason for the high incidence is the widespread presence of acetaminophen in a range of prescription and over-the-counter products. Patients may take these agents together, which may result in liver damage.<sup>1</sup>

To lower the risk of unintentional overdose, the FDA now requires manufacturers of prescription combination products that contain acetaminophen to limit the amount of acetaminophen to no more than 325 mg in each tablet or capsule. In addition, a Boxed Warning highlighting the potential for severe liver injury and a Warning highlighting the potential for allergic reactions (eg, swelling of the face, mouth, and throat, difficulty breathing, itching, or rash) are being added to the labels of all prescription drug products that contain acetaminophen.

The FDA is requiring that a warning about skin reactions be added to the labels of all prescription and OTC medicines containing acetaminophen. The skin reactions (Stevens-Johnson syndrome and toxic epidermal necrolysis) are rare but can be life-threatening when they do occur. The expectation is that by raising awareness of the rare possibility of these skin reactions, symptoms will be treated in time to prevent serious illness or death.

#### References

Schilling A, et al. *Cleve Clin J Med*. 2010;77(1):19-27.

FDA Drug Safety Communication: prescription acetaminophen products to be limited to 325 mg per dosage unit; boxed warning will highlight potential for severe liver failure.

<http://www.fda.gov/Safety/MedWatch/SafetyInformation/SafetyAlertsforHumanMedicalProducts/ucm239955.htm> January 13, 2011. Accessed September 30, 2013.

Food and Drug Administration. Questions and Answers: FDA warns of rare but serious skin reactions with the pain reliever/fever reducer acetaminophen. <http://www.fda.gov/Drugs/DrugSafety/ucm363041.htm> August 1, 2013. Updated August 12, 2013. Accessed September 30, 2013.

TINA:

It may be beneficial to separate the tablet limitations from the label changes in the slides : we did, on the slide

No content restrictions were placed on the OTC formulations – only prescription : we specified prescription products, paragraph 2, line 1

Will need to describe the legislation regarding tablet limits is effective January 2014 : slide sub-bullet 1 under Tablet Limitations

Example image:

<http://www.zmescience.com/other/science-abc/health-abc-acetaminophen-040402013/>

Schilling, 2010. p 19 A&B; p 20 A&B

FDA Dose limit p 1A

FDA Dose limit p 2B, p 3A

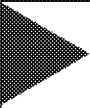
FDA skin reaction p 1A

FDA Dose limit p 1A

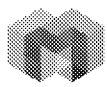
FDA Dose limit p 2B, p 3A

FDA skin reaction p 1A

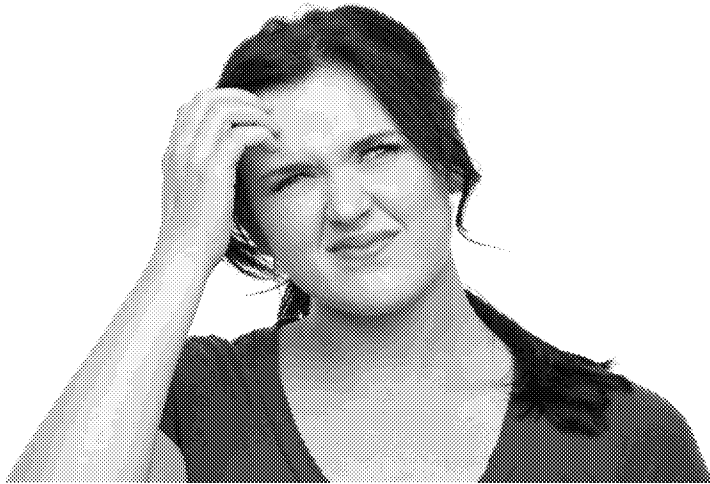




## Confusion Over Proper Dosing



- Tylenol maker voluntarily reduced maximum daily dose to 3000 mg
- Different strengths recommend different maximum doses
- FDA maximum dose is 5 to 7 times lower than estimated lethal dose



1 Krenzelok EP, Royal M. *Drug RD*. 2012;12(2):45-48.

41

The FDA has conducted multiple advisory committee meetings to evaluate acetaminophen and its safety profile and has suggested (but not mandated) a reduction in the maximum daily dosage from 3900-4000mg to 3000-3250mg despite an absence of data showing that the lower dose was associated with lower rates of toxicity.

As many as 50% of individuals with acetaminophen hepatotoxicity have taken an intentional overdose. Risks associated with need to lower the daily dose include patients consuming daily alcohol and those with underlying hepatic disease. The makers of Tylenol (McNeil PPC) voluntarily lowered the maximum recommended daily dose, but for over-the-counter acetaminophen it remains at 4000 mg/day.

Manufacturers of generic acetaminophen have not changed their recommended dosing. These inconsistencies in recommended dosing have potential for patient confusion.

#### References

1. Krenzelok EP, Royal M. Confusion: Acetaminophen dosing changes based on NO evidence in adults. *Drug RD*. 2012;12(2):45-48.

#### Example image:

<http://www.dynamic-bi.com/>

Krenzelok 2012 p. 46 col 2 para 1 L9-13

Krenzelok 2012 p 47 col 1 para 3 L1-8;p. 46 col 1 para 1 L9-13

Krenzelok 2012 p. 46 col 2 para 3 L6-11

Krenzelok 2012 p 47 col 1 para 3 L9-10

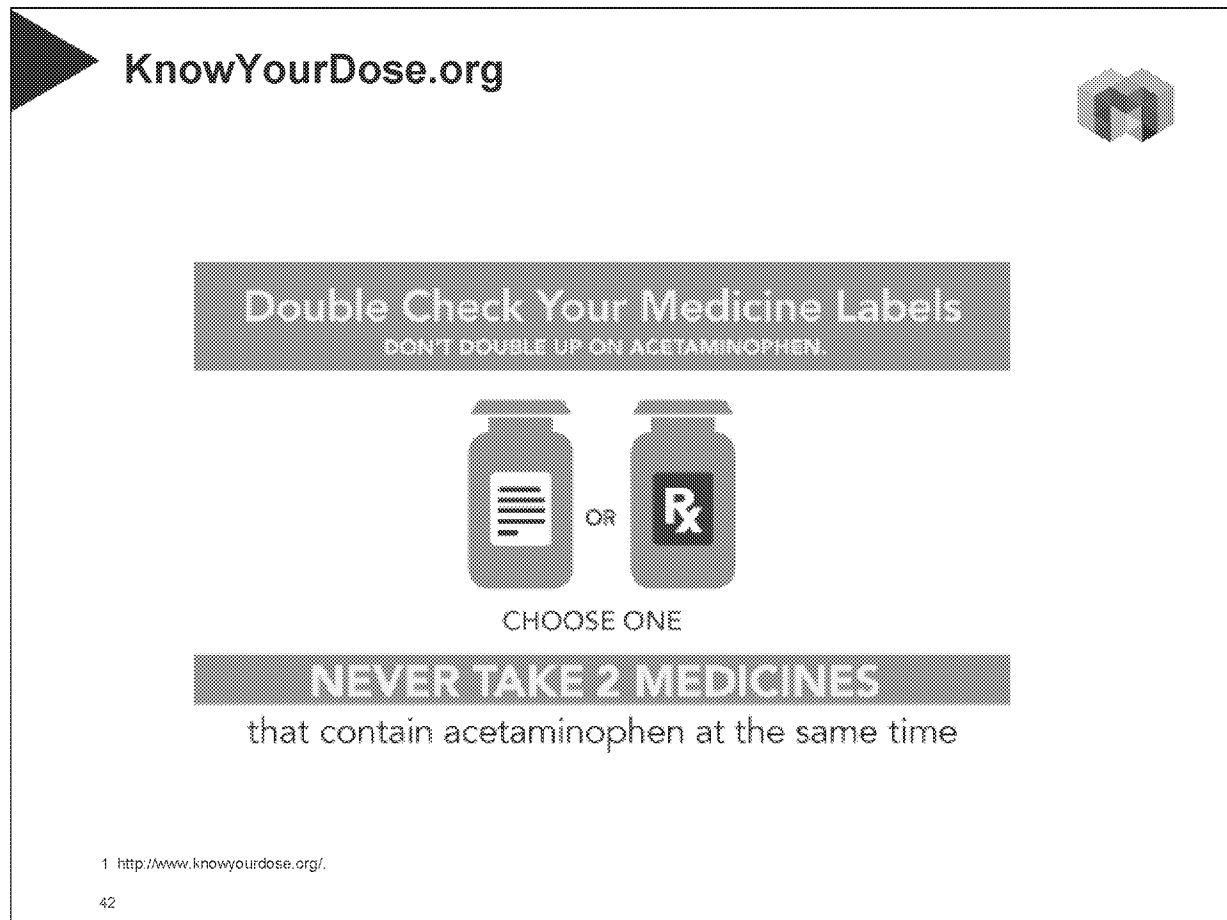
Krenzelok 2012 p 47 col 1 para 3 L1-8; L11-12;p. 46 col 1 para 1 L9-13

Krenzelok 2012 p 47 col 1 para 3; L11-12

Krenzelok 2012 p 46 col 2 para 2; L1-10

Please note: I could not mark up Krenzelok

Krenzelok EP, Royal M. Confusion: Acetaminophen dosing changes based on NO evidence in adults. Drug RD. 2012;12(2):45-48.



One challenge, particularly for patients, is to recognize the number of over-the-counter and prescription medications that contain acetaminophen. The Acetaminophen Awareness Coalition is a group representing consumer organizations, healthcare provider organizations, and health organizations that is attempting to educate patients and prescribers about using acetaminophen safely. Its Web site can be accessed at: KnowYourDose.org.

#### References

1. <http://www.knowyourdose.org/>

Example image:

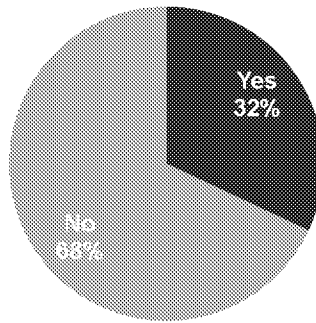
<http://www.dynamic-bi.com/>

## Prescriber Perceptions of the New Vicodin® Formulation



- Only one-third of all respondents expect to see decreased efficacy with 325 mg acetaminophen
- Half of dentists think lower doses of acetaminophen will affect the level of pain relief

**Impact of lower dose of acetaminophen  
on efficacy of Vicodin  
(hydrocodone/acetaminophen)**



Hydrocodone/APAP Primary Market Research. January 28, 2013. Mallinckrodt Pharmaceuticals.

43

With respect to the new Vicodin® formulation, market research found that only 1 in 3 physicians expected that lower doses of acetaminophen in combination with an opioid would decrease efficacy. However, half of dentists were concerned about lower efficacy in pain relief.

### References

Hydrocodone/APAP Primary Market Research. January 28, 2013. Mallinckrodt Pharmaceuticals.

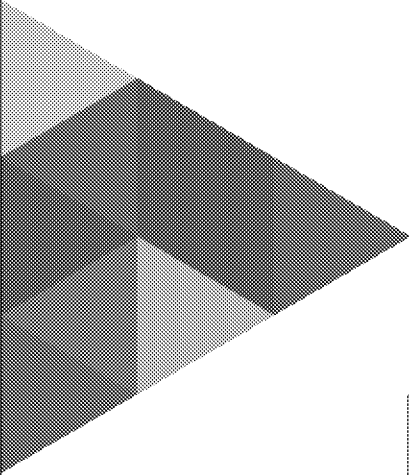
HYCD APAP slides slide #14

Mallinckrodt Pharmaceuticals, data on file.

## Summary



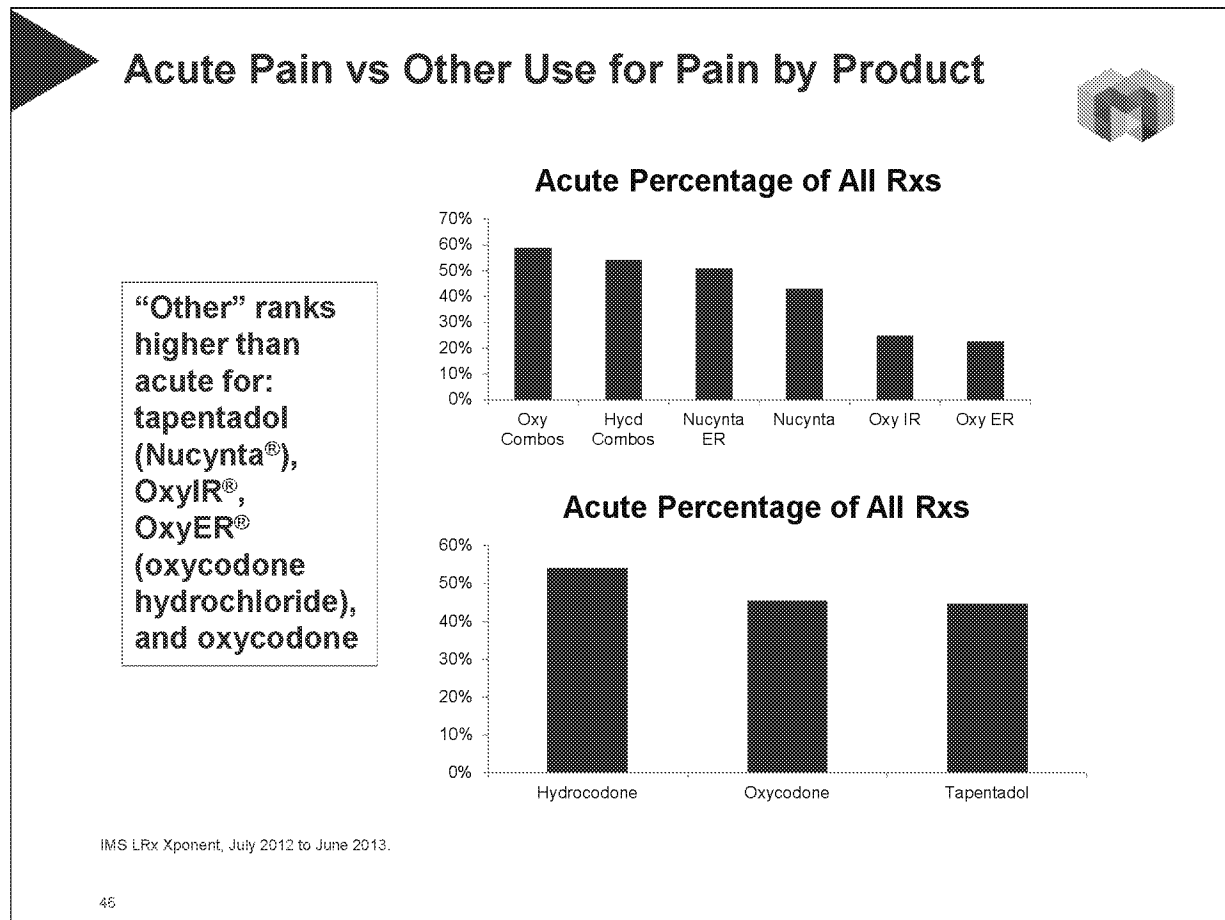
- ▶ FDA is requiring lower doses of acetaminophen in combination products as well as warnings for hepatic injury, allergic reactions, and skin reactions
- ▶ Recommendations for maximum daily dose are inconsistent
- ▶ Most prescribers:
  - ▶ Do not anticipate that lowering acetaminophen content will affect efficacy of combination products
  - ▶ Do not expect to prescribe higher hydrocodone doses



## Competitive Landscape

Malinkrodt team – Please provide any additional key takeaways for competitor data slides. Thank you.





Prescriptions of competitor products can be viewed as the amount of prescriptions for acute pain compared with the amount for other use for pain. When use is viewed by each product and differentiated by molecule, “other” use ranks higher than acute use for tapentadol (Nucynta®), OxyIR®, OxyER® (oxycodone hydrochloride), and oxycodone. For use data for the “other” category see below.

Row Labels Acute Use Other

Oxy Combos 58.68% 41%

Hycd Combos 53.96% 46%

Nucynta ER 50.84% 49%

Nucynta 42.86% 57%

Oxy IR 24.88% 75%

Oxy ER 22.56% 77%

Hydrocodone 53.96% 46%

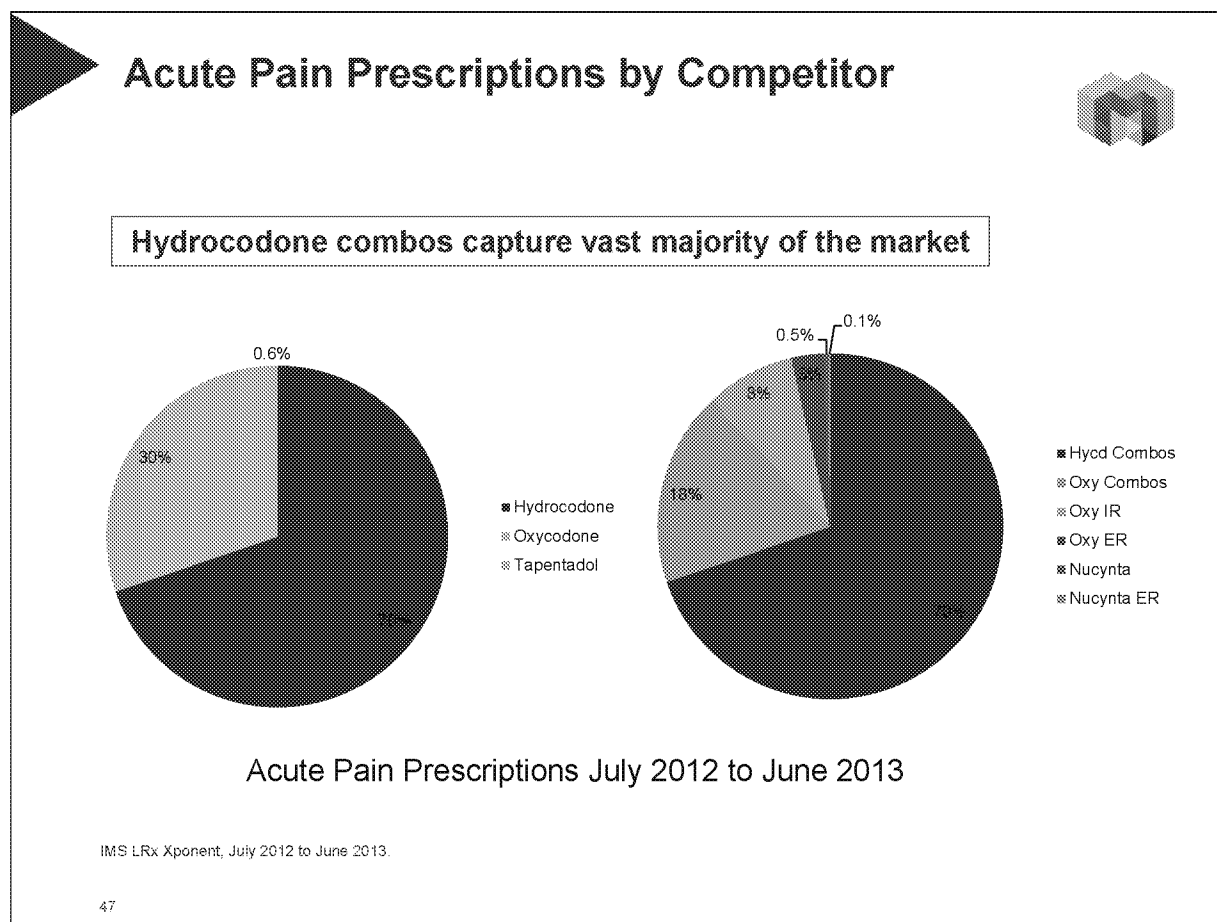
Oxycodone 45.44% 55%

Tapentadol 44.50% 55%

See Excel: Acute Marketplace\_Product,Specialty,Acute Percent.xlsx [Acute %]

Reference

IMS LRx Xponent, July 2012 to June 2013.

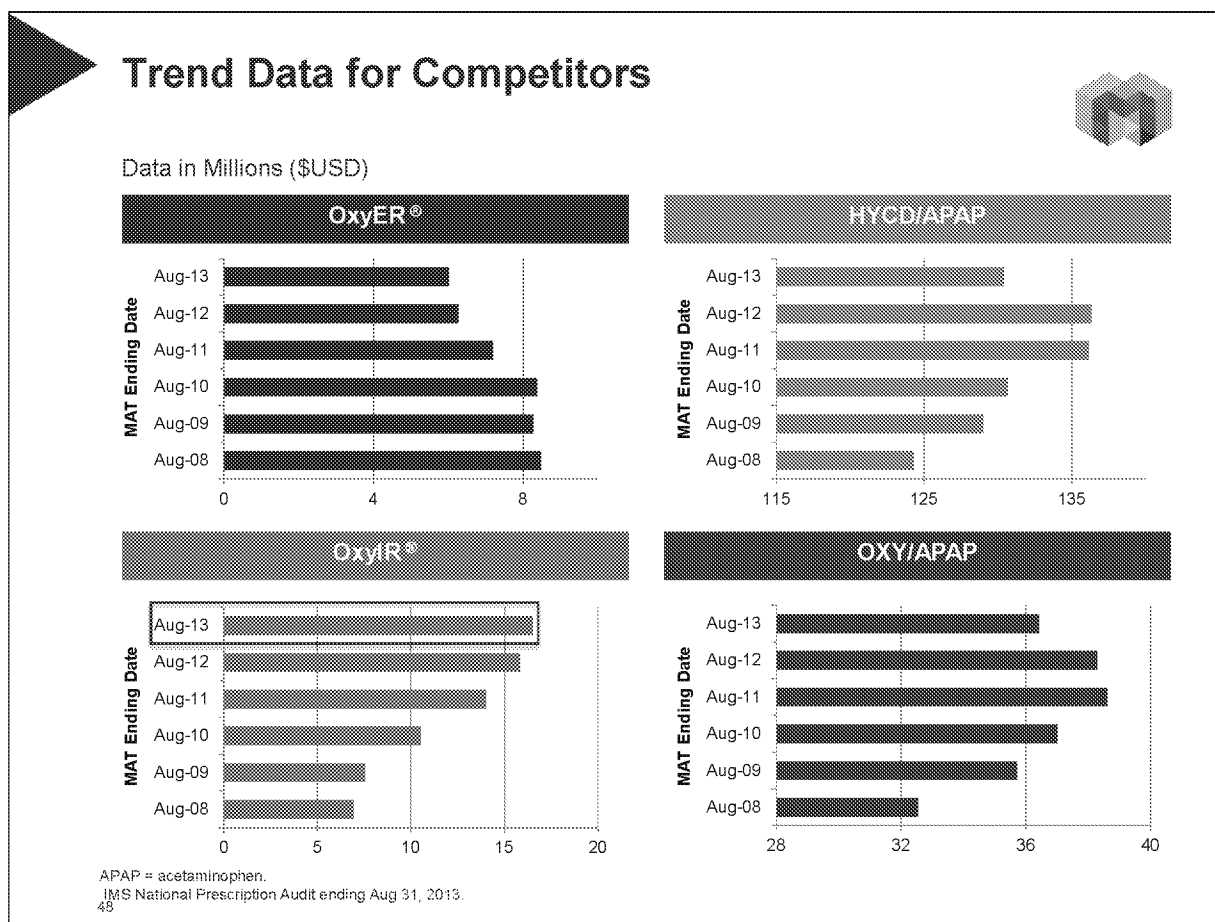


Looking at a snapshot of acute pain prescriptions from July 2012 through June 2013, hydrocodone and hydrocodone combination products make up a vast majority of the acute pain market.

#### References

1. IMS LRx Xponent, July 2012 to June 2013.





If we look at prescription trend data in millions of US dollars shown by competitor, of these products, OxyIR is the only one that has undergone growth (4.3%) over the past 12 months (see below).

#### HYCD/APAP OXYEROXY IROXY/APAP

MAT ending Aug-09 3.8%-2.3% 8.9% 9.8%

MAT ending Aug-10 1.3% 1.1% 39.5% 3.6%

MAT ending Aug-11 4.2%-14.1% 33.3% 4.3%

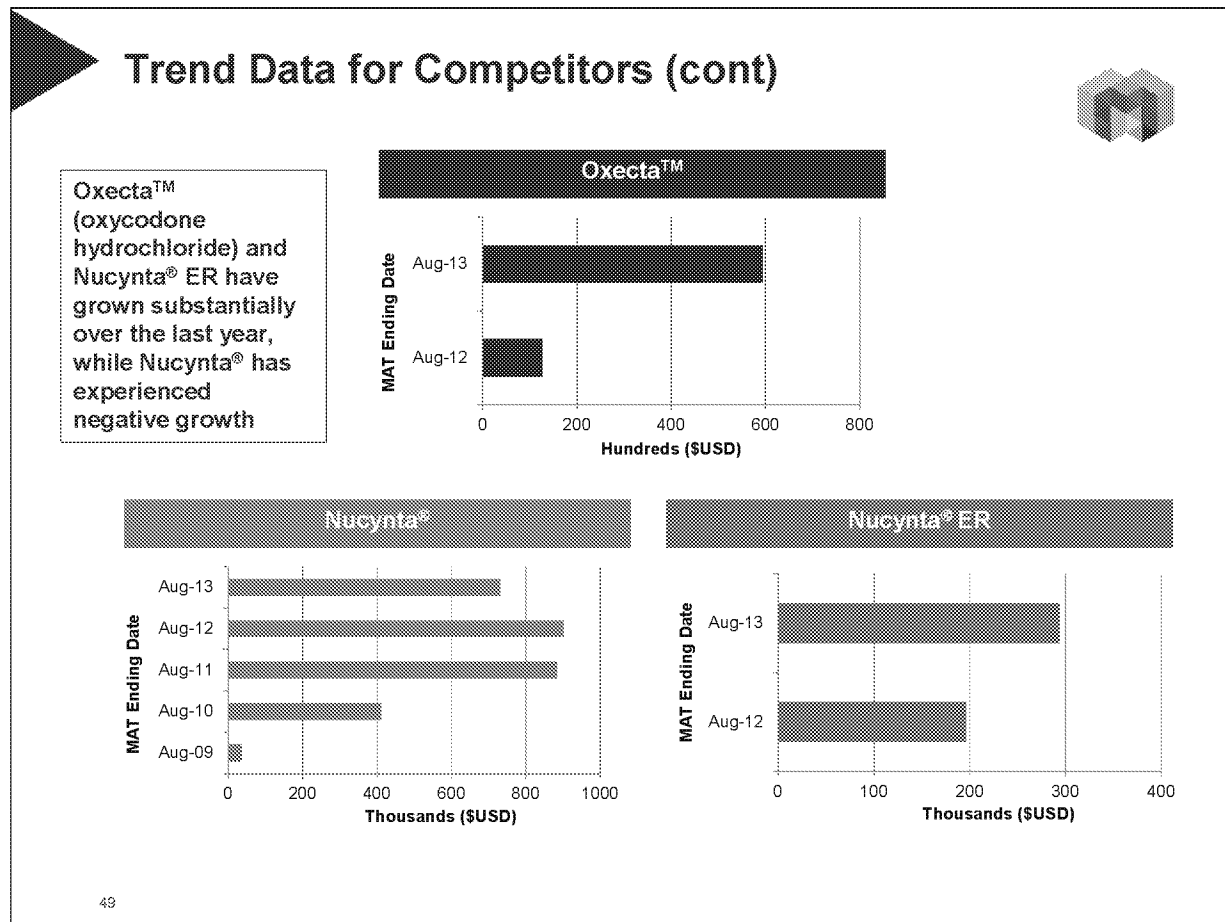
MAT ending Aug-12 0.1%-12.9% 13.0%-0.8%

MAT ending Aug-13 -4.4%-4.0% 4.3%-4.9%

MAT = moving annual total...MAT ending Aug means it includes September through August data.

#### References

1. IMS National Prescription Audit ending Aug 31, 2013.

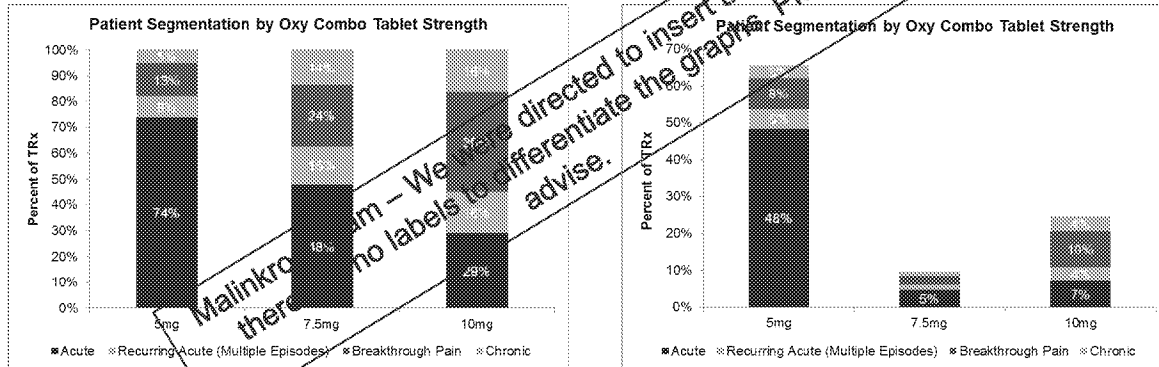


Looking at trend data for Oxecta™, Nucynta® ER, and Nucynta®, the 2 products Oxecta™ and Nucynta® ER have experienced substantial growth while Nucynta® has experienced negative growth.

#### References

1. IMS National Prescription Audit ending Aug 31, 2013.

## Acute Pain Typically Prescribed 5 mg Tablets; 10 mg for Breakthrough and Chronic Pain

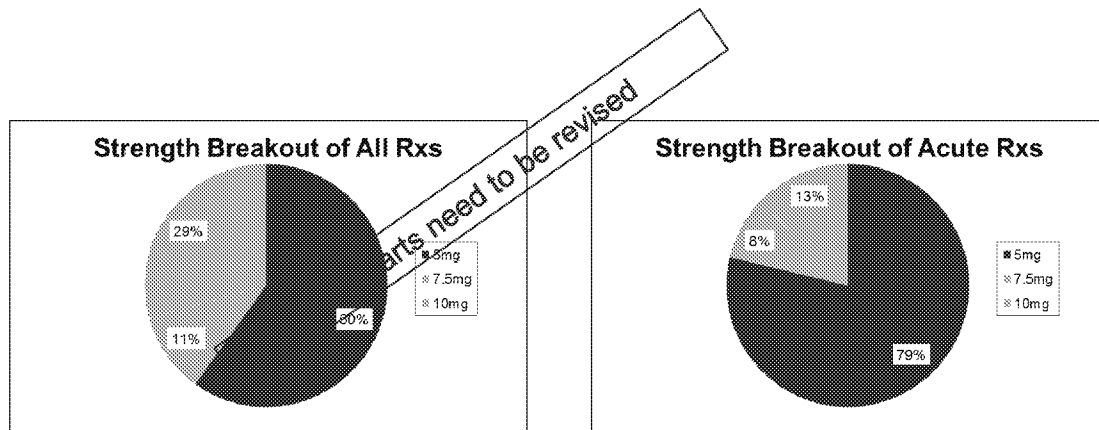


As depicted above, the 5 mg tablets are typically prescribed to patients with acute pain, while the 10 mg tablets are often used for patients with chronic and breakthrough pain.

### References

IMS LRx Xponent™, December 2011 to November 2012.

## Assuming 5 mg Tablets Are Written for Acute Pain, Oxycodone Would be 20-30 mg per day



- Assume total daily dose of 4 to 6 tablets
- Total daily oxycodone dose = 20-30 mg per day

1. IMS LRx Xponent™, December 2011 to November 2012
2. IMS Xponent Plantrak, May 2012 to April 2013.

51

Assuming the 5 mg tablets are typically prescribed for acute pain, and 4 to 6 tablets per day are taken, then the daily dosage of oxycodone would be 20-30 mg per day.

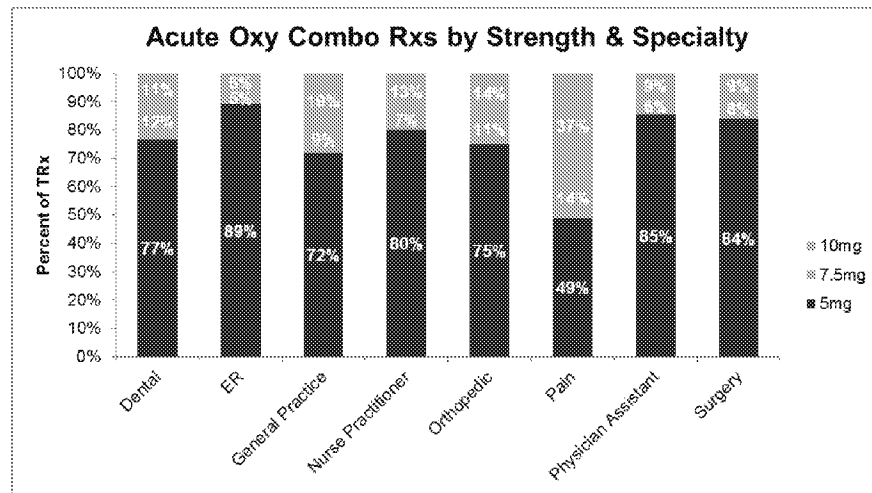
### References

1. IMS LRx Xponent™, December 2011 to November 2012.
2. IMS Xponent Plantrak, May 2012 to April 2013.

## Notable Differences in Strength Utilization Exist Across Specialties



- ER, PAs, and surgeons are most likely to prescribe 5 mg tablet



IMS LRx Xponent™, December 2011 to November 2012.

52

Different specialties tend to prescribe different strengths. Notable differences in strength utilization exist across specialties. ER, PAs and surgeons are the most likely to prescribe the 5 mg tablet.

### References

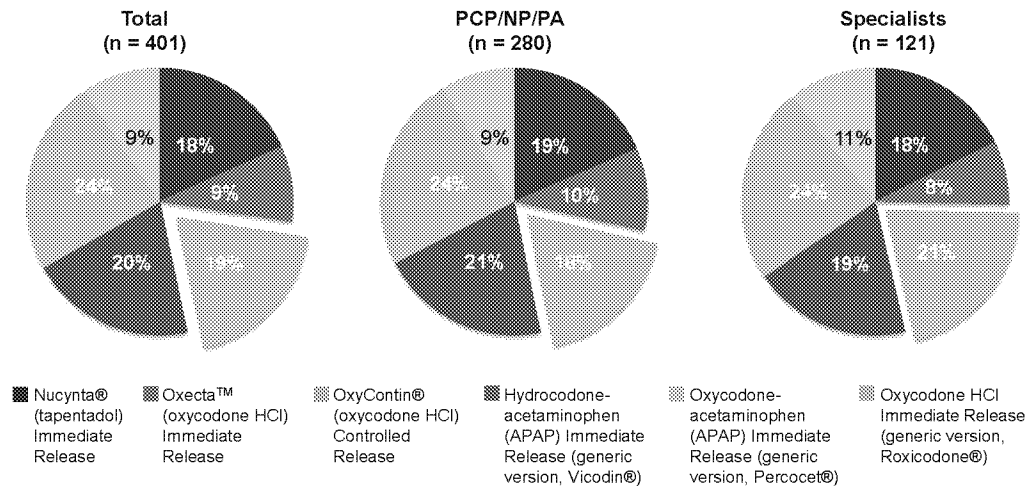
IMS LRx Xponent™, December 2011 to November 2012.

## Physician Expectations of Replacing OxyContin® With MNK-795



Malinkrodt team – are we allowed to keep these MNK-795 slides in the deck if pre-launch?

### Source of Volume for MNK-795



**Generic versions of Oxycontin, Vicodin, Percocet, Nucynta, Roxicodone and Oxecta are the primary sources of business for the new brand.**

1 Malinkrodt Pharmaceuticals MNK-795 Situation Analysis. July 17, 2013. .

53

To determine potential market sources, physicians were asked how they would distribute their prescriptions across existing products with and without MNK-795 included in the marketplace. This slide shows the proportion of reallocation from existing products to MNK-795.

Overall, 19% of physicians would replace a portion of their OxyContin prescriptions with scripts for MNK-795. Slightly more specialists would do so than primary care physicians (21% vs 18%, respectively).

#### References

1. Malinkrodt Pharmaceuticals. MNK-795 Situation Analysis. July 17, 2013.

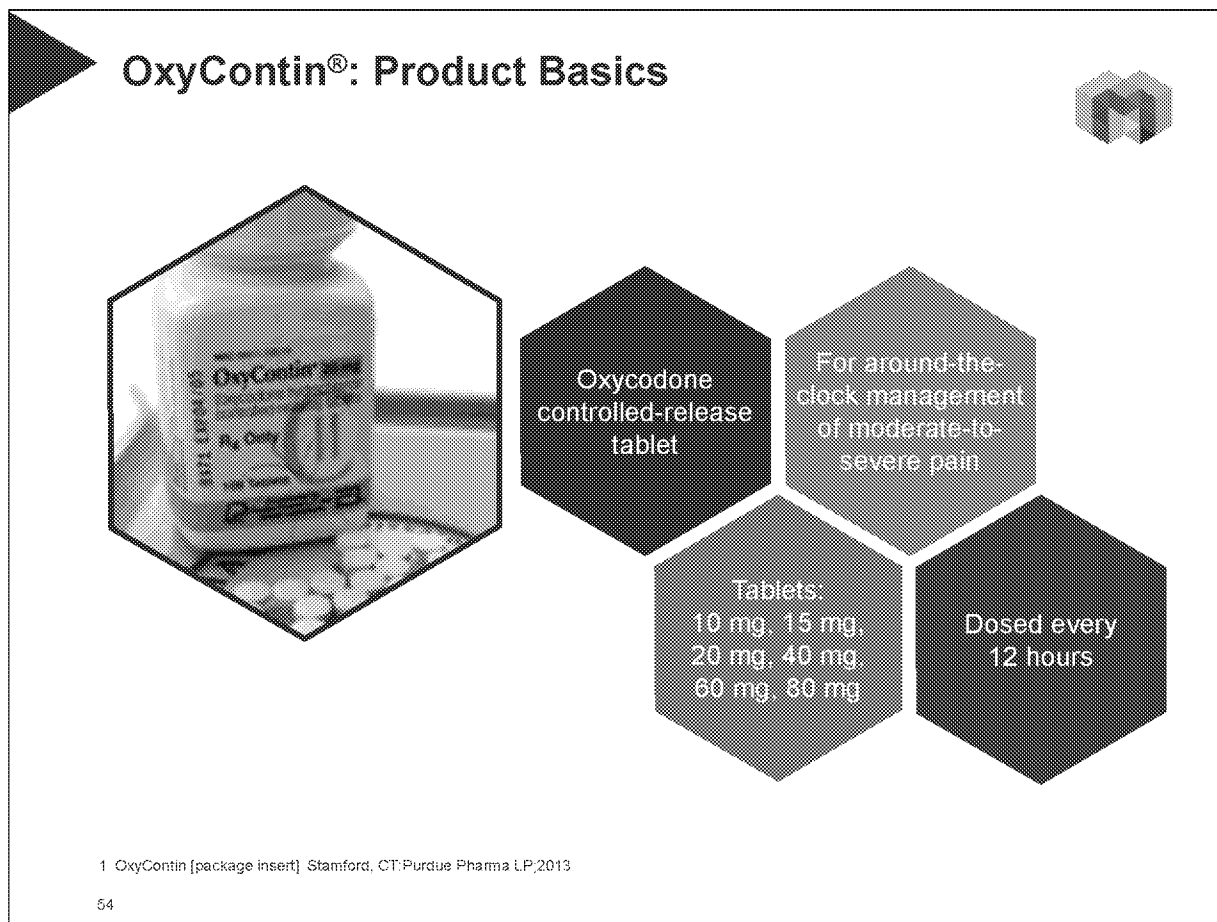
#### TINA:

Use this slide to set up the competitive landscape, before launching into each of the individual products.

Situation analysis slide 83

Mallinckrodt Pharmaceuticals, data on file.

**OxyContin®: Product Basics**



The diagram features a central image of an OxyContin bottle and a tray of tablets. To the right, four hexagonal boxes contain the following text:

- Oxycodone controlled-release tablet
- For around-the-clock management of moderate-to-severe pain
- Tablets: 10 mg, 15 mg, 20 mg, 40 mg, 60 mg, 80 mg
- Dosed every 12 hours

1. OxyContin [package insert]. Stamford, CT:Purdue Pharma LP;2013.

54

The OxyContin® label is specific that it is not to be used for acute pain or for postoperative pain unless the patient is already receiving chronic opioid therapy prior to surgery or unless the postoperative pain is expected to be moderate to severe and persisting for an extended period of time. The label precludes PRN use. With new labeling requirements, the label can no longer claim an indication for moderate pain.

#### References

1. OxyContin [package insert]. Stamford, CT:Purdue Pharma LP;2013.

#### Example image:

<http://hereandnow.wbur.org/2012/03/28/oxycontin-canada-ontario>

OxyContin PI p1 A

Sept 10 UCM p 8A

OxyContin PI p1 B

OxyContin PI p1 C

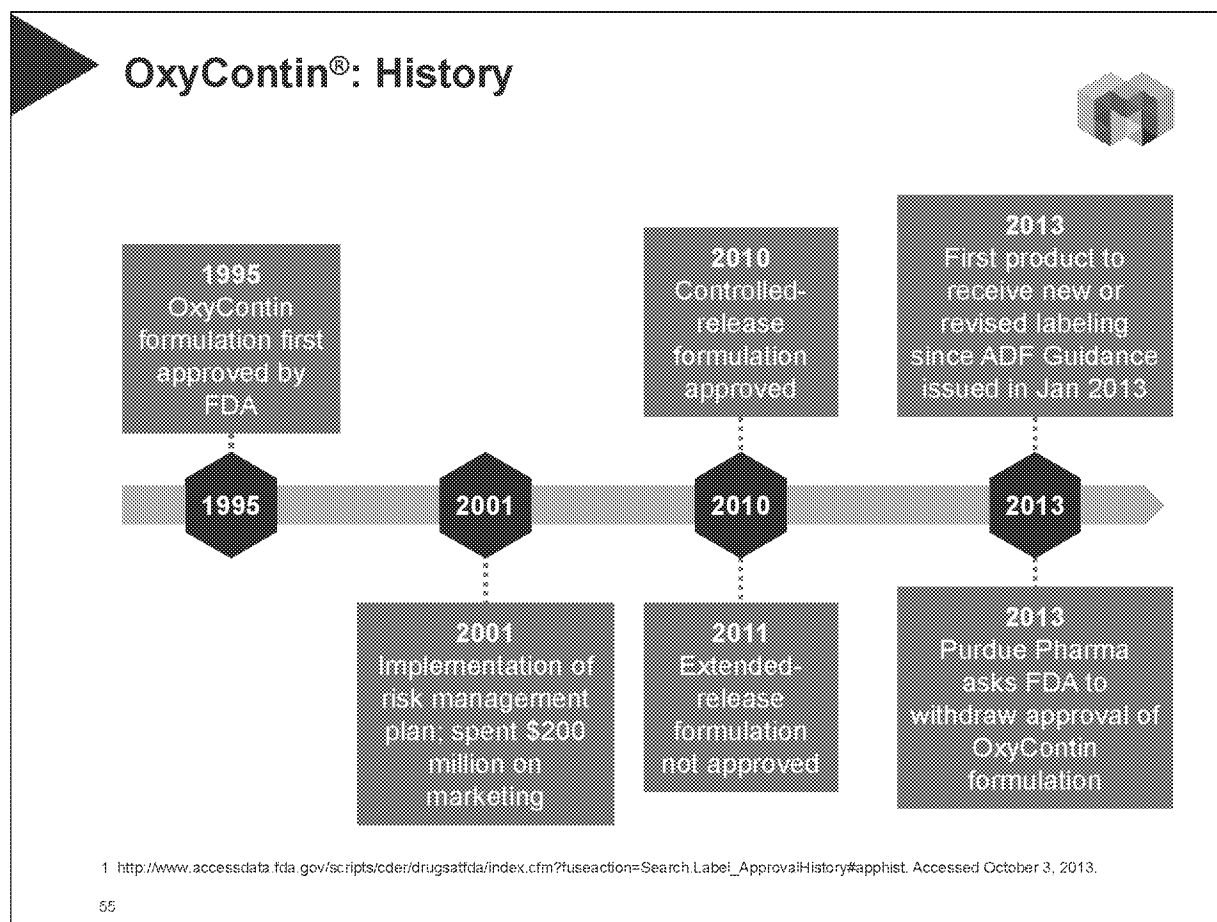
Oxycontin PI p5A

OxyContin[package insert]. Stamford, CT:Purdue Pharma LP;2013.

Food and Drug Administration.

<http://www.fda.gov/downloads/Drugs/DrugSafety/InformationbyDrugClass/UCM367697.pdf>. Accessed September 11, 2013.





In response to abuse of OxyContin among recreational drug users, Purdue worked with the FDA to develop a risk management plan. Implemented in 2001, the plan included education and outreach, labeling changes, surveillance and intervention. Generics were introduced and phased out of the market. Oxycontin was the first to receive new/revised labeling since the January 2013 issuance of ADF guidance.

According to claims in the latest 2013 Oxycontin PI, in vitro data demonstrate that OxyContin has physicochemical properties expected to make abuse via injection difficult and that are also expected to reduce abuse via the intranasal route. However, abuse of OxyContin by these routes, as well as by the oral route is still possible. Also according to the label, OxyContin can be abused and is subject to misuse, addiction and criminal diversion.

#### References

Label and approval history:

[http://www.accessdata.fda.gov/scripts/cder/drugsatfda/index.cfm?fuseaction=Search.Label\\_ApprovalHistory#apphist](http://www.accessdata.fda.gov/scripts/cder/drugsatfda/index.cfm?fuseaction=Search.Label_ApprovalHistory#apphist). Accessed October 3, 2013.

OxyContin [package insert]. Stamford, CT:Purdue Pharma LP;2013.

Introduction of generics

Phase-out of generics from the market

January Include key dates from this year's label update to include claims in accordance with FDA Guidance on ADFs – Section 9.2 of the PI

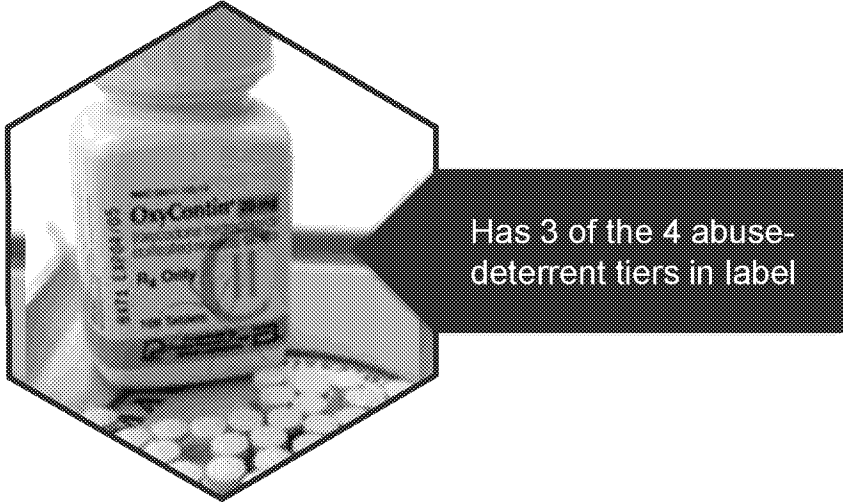
TINA:

Please include revised label as of 2013 – first product to receive new or revised labeling since January 2013 ADF  
Guidance Issuance

FDA History of oxycontin, slides 11-13

Abuse-deterrent deck slide 18

**Getting to Know the Competition: OxyContin®**



Has 3 of the 4 abuse-deterrent tiers in label

1. OxyContin [package insert]. Stamford, CT: Purdue Pharma; 2013.  
2. Cicerto TJ, et al. *J Pain*. 2005;6(10):662-672.

55

OxyContin extended-release label contains abuse-deterrent studies consistent with FDA categories 1-3. Once post-marketing data are available, this will be the first product to obtain revised labeling following the introduction of the FDA Guidance on abuse deterrent formulations.

OxyContin bridges the prescribing gap between acute and chronic pain, but is not indicated for acute pain, and it has a stigma of abuse.

#### Reference

1. OxyContin [package insert]. Stamford, CT: Purdue Pharma; 2013.
2. Cicerto TN, Inciardi JA, Muñoz A. Trends in abuse of oxycontin and other opioid analgesics in the United States: 2002-2004. *J Pain*. 2005;6(10):662-672.

#### Example image:

[http://www.123rf.com/photo\\_4890831\\_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html](http://www.123rf.com/photo_4890831_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html)

OxyContin[package insert]. Stamford, CT:Purdue Pharma LP;2013.

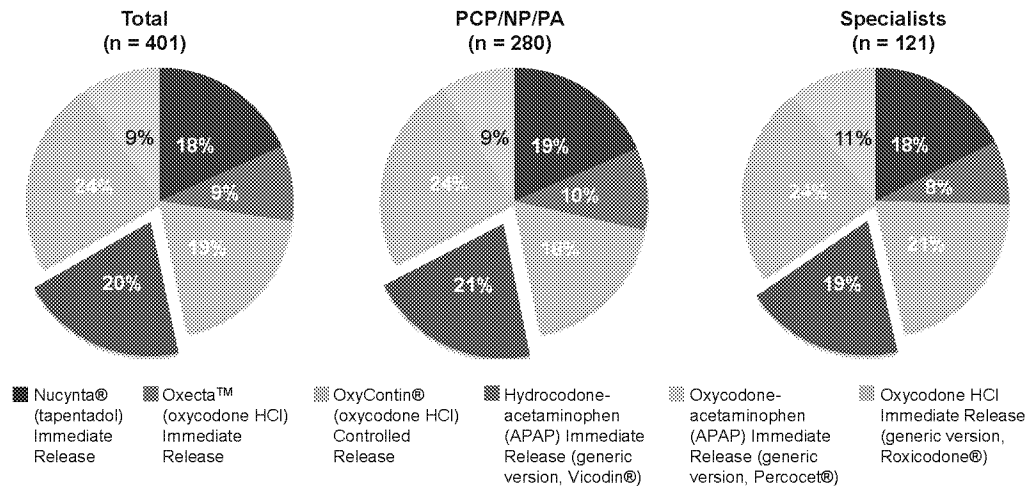
OxyContin PI p. 16 A, B; p. 17A

OxyContin PI p. 16 A, B; p. 17A

## Physician Expectations of Replacing Vicodin® With MNK-795



### Source of Volume for MNK-795



**Generic versions of Oxycontin, Vicodin, Percocet, Nucynta, Roxicodone and Oxecta are the primary sources of business for the new brand.**

Mallinckrodt Pharmaceuticals. MNK-795 Situation Analysis. July 17, 2013.

57

Overall, 20% of physicians would replace a portion of their Vicodin® (hydrocodone-acetaminophen) prescriptions with scripts for MNK-795. There was not much difference between specialists and primary care physicians (19% vs 21%, respectively).

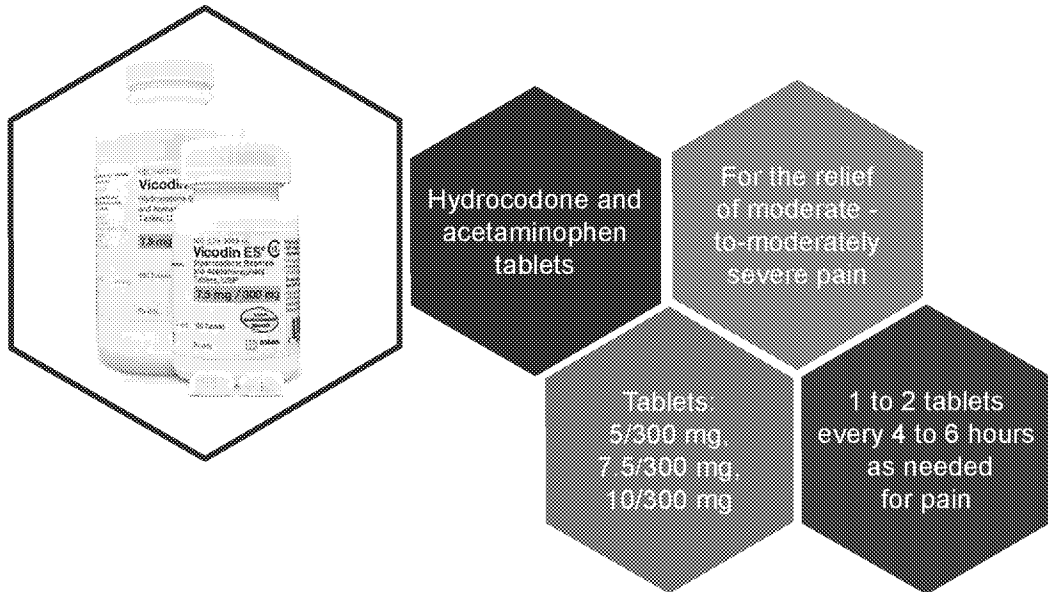
#### Reference

Mallinckrodt Pharmaceuticals. MNK-795 Situation Analysis. July 17, 2013.

Situation analysis slide 83

Mallinckrodt Pharmaceuticals, data on file.

**Vicodin®: Product Basics**



The diagram consists of a central hexagon containing an image of Vicodin product packaging (bottles and blister packs). To the right of this central hexagon are three smaller hexagons arranged in a triangular pattern. The top-left hexagon contains the text 'Hydrocodone and acetaminophen tablets'. The top-right hexagon contains the text 'For the relief of moderate - to-moderately severe pain'. The bottom-left hexagon contains the text 'Tablets: 5/300 mg, 7.5/300 mg, 10/300 mg'. The bottom-right hexagon contains the text '1 to 2 tablets every 4 to 6 hours as needed for pain'.

1 Vicodin [package insert]. North Chicago, IL: AbbVie; 2 013.

58

Currently, Vicodin® is indicated for the relief of moderate or moderately severe pain, but the indication does not specify acute or chronic pain. Dosing for 3 strengths is 1 or 2 tablets every 4 to 6 hours. The maximum number of tablets is 8 daily for the 5/300 mg tablets and 6 daily for either of the higher doses.

#### Reference

Vicodin [package insert]. North Chicago, IL: AbbVie; 2013.

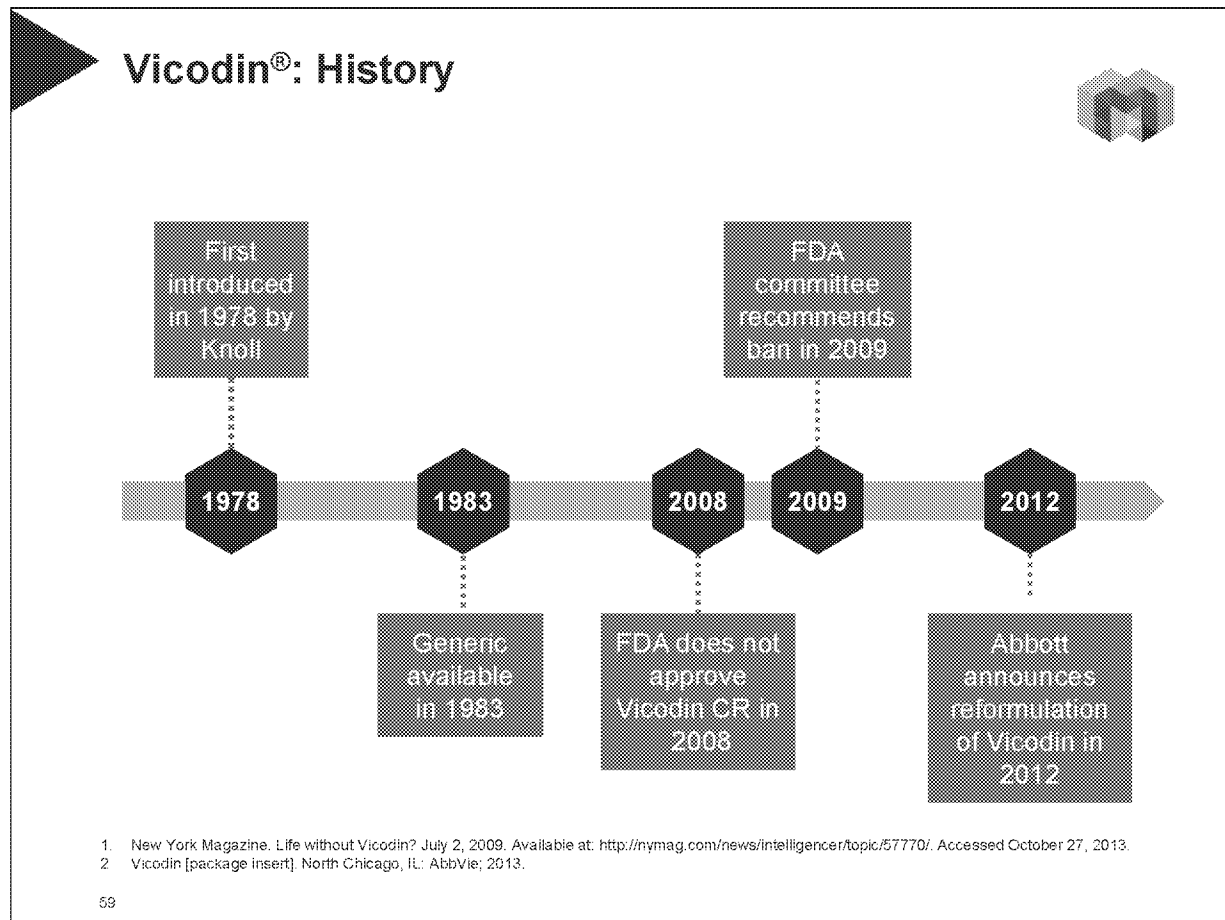
#### Example image:

<http://www.vicodin.com/hcp/dosage.cfm>

Vicodin PI p 4 A

Vicodin PI p1 A

Vicodin PI p 11 A



Knoll first introduced Vicodin® in 1978, and its generic formulation became available in 1983. In 2006, Americans were written 130 million prescriptions for hydrocodone-containing products. In 2008, Abbott planned to market a controlled-release Vicodin product; however, the product did not receive FDA approval, and, within a few months, Abbott laid off approximately 200 sales representatives designated to sell the product. A federal advisory panel voted on June 30, 2009, to recommend that the FDA ban Vicodin.<sup>1</sup> The product has since been reformulated in keeping with FDA recommendations and is available as hydrocodone/acetaminophen 5/300 mg, 7.5/300 mg and 10/300 mg.<sup>2</sup>

#### References

New York Magazine. Life without Vicodin? July 2, 2009. Available at: <http://nymag.com/news/intelligencer/topic/57770/>. Accessed October 27, 2013.

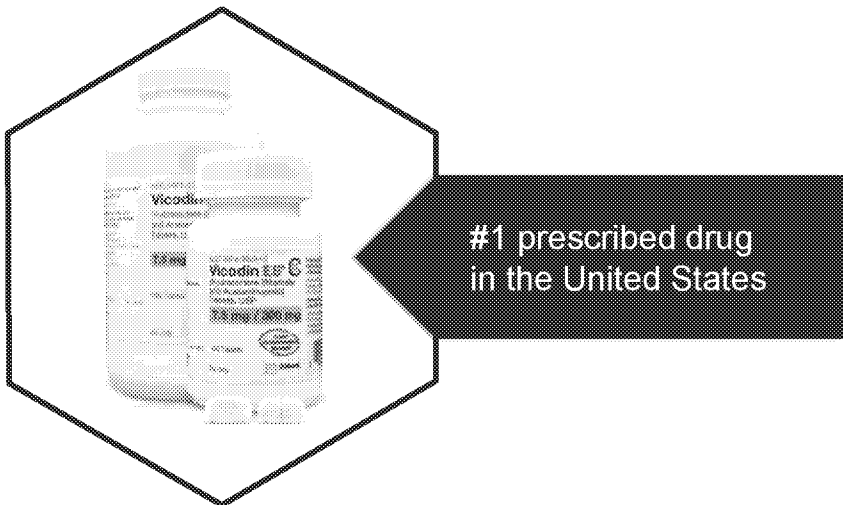

Vicodin [package insert]. North Chicago, IL: AbbVie; 2013.

#### COMMENTS:

2008: Vicodin CR denied by FDA

Include release of reformulation by Abbott

**Getting to Know the Competition: Vicodin®**



**#1 prescribed drug  
in the United States**

Manchikanti L, et al Pain Physician 2012;15(3 Suppl) ES9-ES38.

60

Collectively, Vicodin® (hydrocodone plus acetaminophen) and its numerous generic versions continue to be the most widely prescribed medication in the United States.<sup>1</sup> Abbvie, Inc., the manufacturer of Vicodin, released a formulation containing 300 mg of acetaminophen in advance of the FDA deadline for reformulation, which is January 2014.<sup>2</sup> Two states have reclassified Vicodin as a schedule II drug.<sup>3,4</sup>

#### References

Manchikanti L, Helm S II, Fellow B, et al. Opioid epidemic in the United States. Pain Physician 2012;15(3 Suppl):ES9-ES38.

Vicodin Web site. Available at: [http://www.vicodin.com/hcp/?cid=ppc\\_ppd\\_vcdn\\_ggl\\_ppc\\_0616](http://www.vicodin.com/hcp/?cid=ppc_ppd_vcdn_ggl_ppc_0616). Accessed September 12, 2013.

Oklahoma Department of Health. Available at: <http://www.ok.gov/OSBP/Announcements/>. Accessed September 10, 2013

Department of Health of the State of NY. Available at:  
[http://www.health.ny.gov/professionals/narcotic/laws\\_and\\_regulations/part\\_c-chapter\\_447-laws\\_of\\_2012-faq.htm](http://www.health.ny.gov/professionals/narcotic/laws_and_regulations/part_c-chapter_447-laws_of_2012-faq.htm).  
Accessed September 10, 2013.

Example image:

[http://www.123rf.com/photo\\_4890831\\_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html](http://www.123rf.com/photo_4890831_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html)

Manchikanti p ES23A

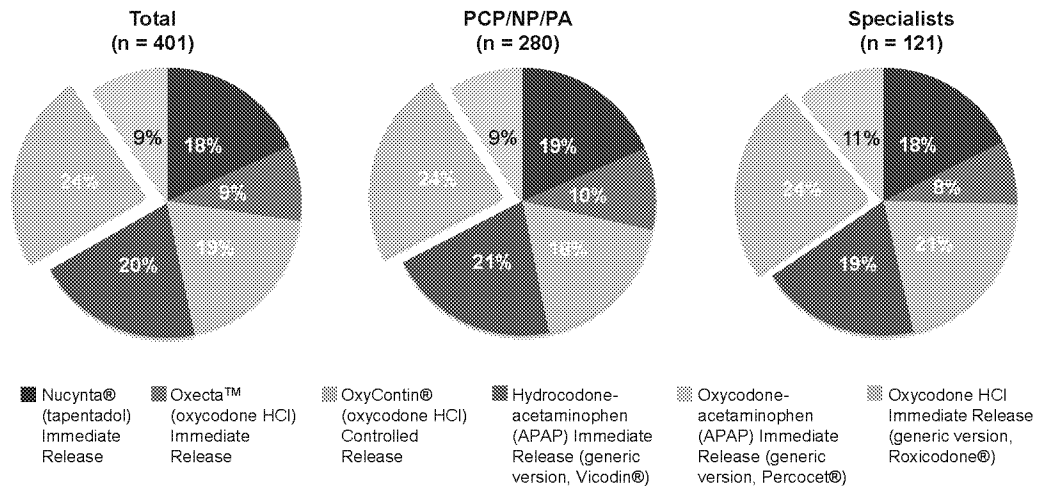
Manchikanti p ES23A

2/Vicodin web site p 1A

## Physician Expectations of Replacing Percocet<sup>®</sup> With MNK-795



### Source of Volume for MNK-795



Generic versions of Oxycontin, Vicodin, Percocet, Nucynta, Roxicodone and Oxecta are the primary sources of business for the new brand.

Mallinckrodt Pharmaceuticals. MNK-795 Situation Analysis. July 17, 2013..

61

Overall, 24% of physicians would replace a portion of their oxycontin-acetaminophen IR prescriptions with scripts for MNK-795. There was no difference between specialists and primary care physicians (both 24%).

#### Reference


Mallinckrodt Pharmaceuticals. MNK-795 Situation Analysis. July 17, 2013.

Situation analysis slide 83

Mallinckrodt Pharmaceuticals, data on file.



**Percocet®: Product Basics**



Oxycodone and acetaminophen tablets

For the relief of moderate-to-moderately severe pain

Tablets  
2.5/325 mg,  
5/325 mg,  
7.5/325 mg,  
7.5/500 mg,  
10/325 mg

1 to 2 tablets every 6 hours as needed for pain

Percocet [package insert]. Chadds Ford, PA: Endo Pharmaceuticals; 2012.

62

Currently, Percocet®, like Vicodin, is indicated for relief of moderate-to-moderately severe pain, without specifying whether it is for use in acute or chronic pain. Although most tablets meet the FDA recommended dose of acetaminophen ( $\leq 325$  mg/tablet), the highest available dose is 500 mg/tablet.

#### Reference

Percocet [package insert]. Chadds Ford, PA: Endo Pharmaceuticals; 2012.

Example image:

<http://drugsnow.org/percocet-withdrawal-symptoms/>

Percocet PI p. 1A

Percocet PI p. 2A

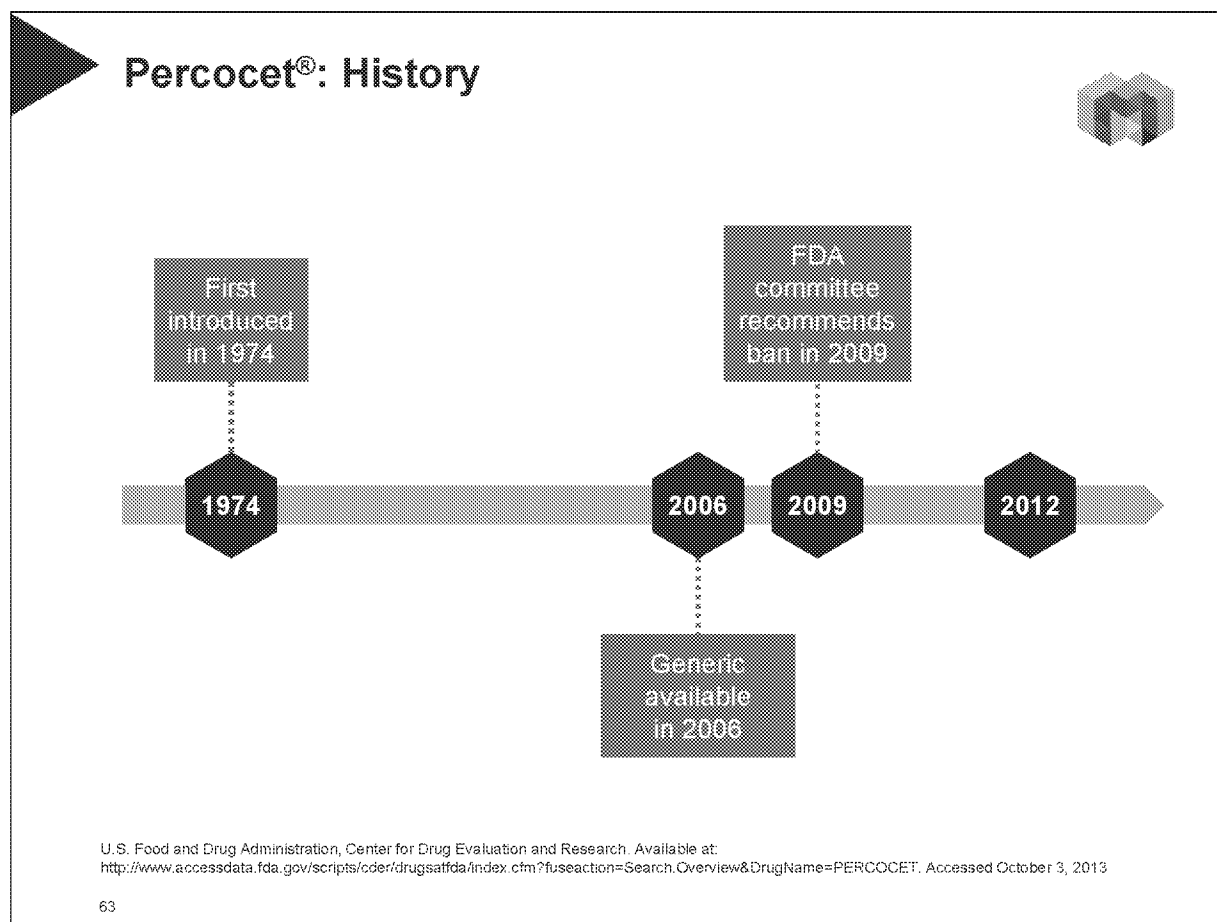
Percocet PI p. 4A

Percocet PI p. 18A

Percocet [package insert]. Chadds Ford, PA: Endo Pharmaceuticals; 2012.

Percocet PI p. 4A

Percocet PI p. 18A




The FDA initially approved Percocet® in 1976 as a Vintage Pharms LLC product under application ANDA 085106.1 Then in March of 2006 Endo began making Percocet in 6 different dosages. Endo was created as a result of a management buyout by DuPont Merck management in 1997. In June of 2009, an FDA advisory panel recommended that Percocet sales be limited due to its contributions to acetaminophen-related US deaths every year secondary to hepatic injury.<sup>2</sup>

#### References

U.S. Food and Drug Administration, Center for Drug Evaluation and Research. Available at: <http://www.accessdata.fda.gov/scripts/cder/drugsatfda/index.cfm?fuseaction=Search.Overview&DrugName=PERCOCET>. Accessed October 3, 2013.

Los Angeles Times. FDA panel calls for restrictions on Tylenol, Vicodin, Percocet. July 1, 2009. Available at: <http://articles.latimes.com/2009/jul/01/nation/na-tylenol1>. Accessed October 17, 2013. [Ref: LA Times FDA panel calls for restrictions on Tylenol]

**Getting to Know the Competition: Percocet®**



Long history of use...  
well-established efficacy

Percocet [package insert]. Chadds Ford, PA: Endo Pharmaceuticals; 2012.

64

Available since the 1990s, Percocet® (oxycodone/APAP combination) immediate-release formulation has longstanding name recognition and its efficacy is well established. Along with the generic version, Percocet is the Number 2 opioid prescribed.

#### References

Percocet [package insert]. Chadds Ford, PA: Endo Pharmaceuticals; 2012.

MNK795 Situation Analysis: Market Overview and Market Map. Mallinckrodt Pharmaceuticals; 2013.

Example image:

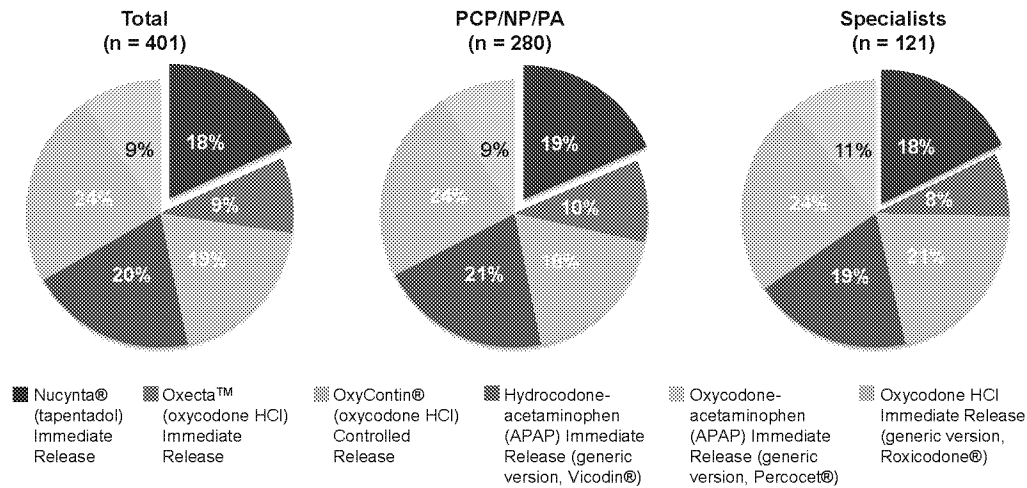
[http://www.123rf.com/photo\\_4890831\\_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html](http://www.123rf.com/photo_4890831_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html)

Manchikanti p ES23A

## Physician Expectations of Replacing Nucynta® With MNK-795



### Source of Volume for MNK-795



**Generic versions of Oxycontin, Vicodin, Percocet, Nucynta, Roxicodone and Oxecta are the primary sources of business for the new brand.**

Mallinckrodt Pharmaceuticals. MNK-795 Situation Analysis. July 17, 2013.

65

Overall, 18% of physicians would replace a portion of their Nucynta IR prescriptions with scripts for MNK-795. There was essentially no difference between specialists and primary care physicians (19% vs 18%, respectively). Nucynta ER was not included in this market research exercise.

#### Reference

Mallinckrodt Pharmaceuticals. MNK-795 Situation Analysis. July 17, 2013.  
Situation analysis slide 83

**Nucynta® : Product Basics**

1. Nucynta [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2013.  
2. Nucynta ER [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2012.

65

Nucynta® immediate-release tablets were approved in 2008 for treatment of moderate-to-severe pain. Nucynta is indicated for acute pain.

#### References

Nucynta ER [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2012.

Nucynta [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2013.

Example image:

<http://www.empr.com/nucynta-er-approved-for-neuropathic-pain/article/256569/>

1/Nucynta p. 1A

2/Nucynta ER p. 1A

1/Nucynta p. 1A

2/Nucynta ER p. 1A

1/Nucynta p. 1B

2/Nucynta ER p. 1B

1/Nucynta p. 1D

2/Nucynta ER p. 3A

1/Nucynta p. 1C

2/Nucynta ER p. 1C

2/Nucynta ER p. 1B

**Nucynta® ER: Product Basics**

Tapentadol ER tablets

ER tablets  
For management of chronic pain and neuropathic pain associated with diabetes

ER tablets, 50 mg, 100 mg, 150 mg, 200 mg, 250 mg

Individualized, titrated dosing

1. Nucynta [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2013.  
2. Nucynta ER [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2012.

67

Nucynta® extended-release (ER) tablets were also approved in 2008 for treatment of moderate-to-severe pain. Nucynta ER is also indicated for neuropathic pain associated with diabetic neuropathy. The package insert for the ER formulation specifies that it be used when a continuous, around-the-clock opioid analgesic is needed for an extended period of time. The ER formulation is indicated for chronic pain.

#### References

Nucynta ER [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2012.

Nucynta [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2013.

Example image:

<http://www.empr.com/nucynta-er-approved-for-neuropathic-pain/article/256569/>

1/Nucynta p. 1A

2/Nucynta ER p. 1A

1/Nucynta p. 1A

2/Nucynta ER p. 1A

1/Nucynta p. 1B

2/Nucynta ER p. 1B

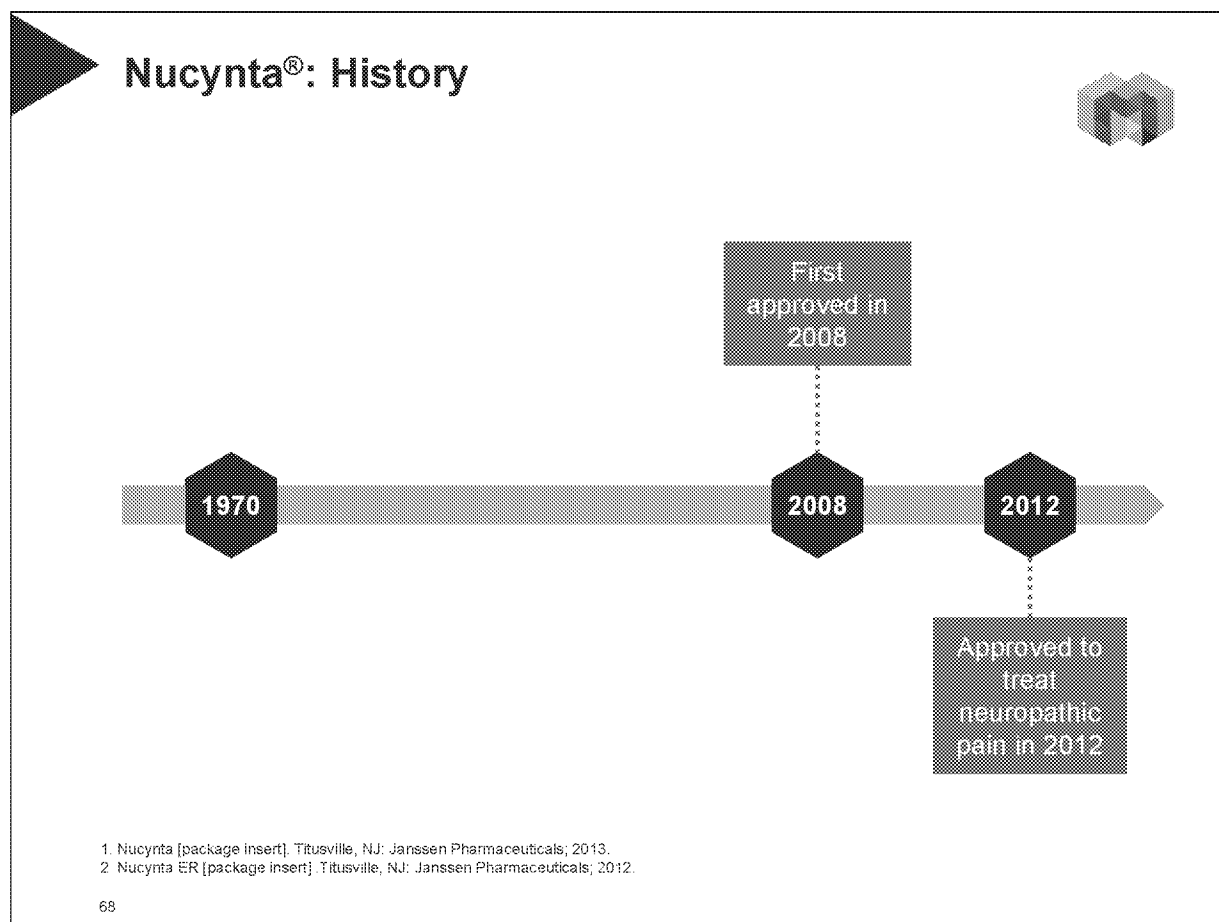
1/Nucynta p. 1D

2/Nucynta ER p. 3A

1/Nucynta p. 1C

2/Nucynta ER p. 1C

2/Nucynta ER p. 1B



Both formulations were approved in 2008. In 2012, the extended-release formulation received the indication for neuropathic pain associated with diabetic nephropathy.

#### References

Nucynta ER [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2012.

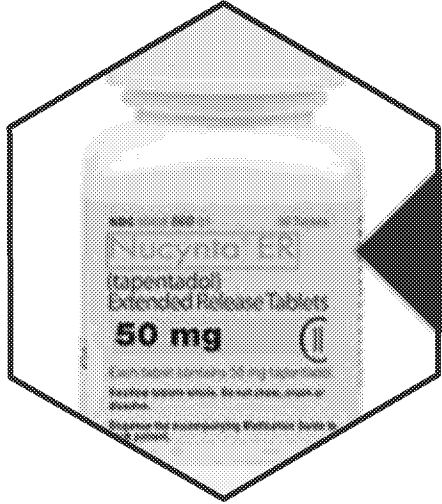
Nucynta [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2013.

1/Nucynta p. 1A

2/Nucynta ER p. 1A



**Getting to Know the Competition: Nucynta®**



**Not your typical opioid-mixed class; not for acute pain**

1. Nucynta [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2013.  
2. Nucynta ER [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2012.

69

The exact mechanism of action of tapentadol, a centrally acting agent, is unknown. It is thought that its analgesic effects result from a combination of its  $\mu$ -opioid receptor agonist activity and norepinephrine reuptake inhibition.<sup>1</sup>

#### References

Nucynta ER [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2012.

Nucynta [package insert]. Titusville, NJ: Janssen Pharmaceuticals; 2013.

Stigma of availability, low stigma of abuse

Marketed as “more tolerable”

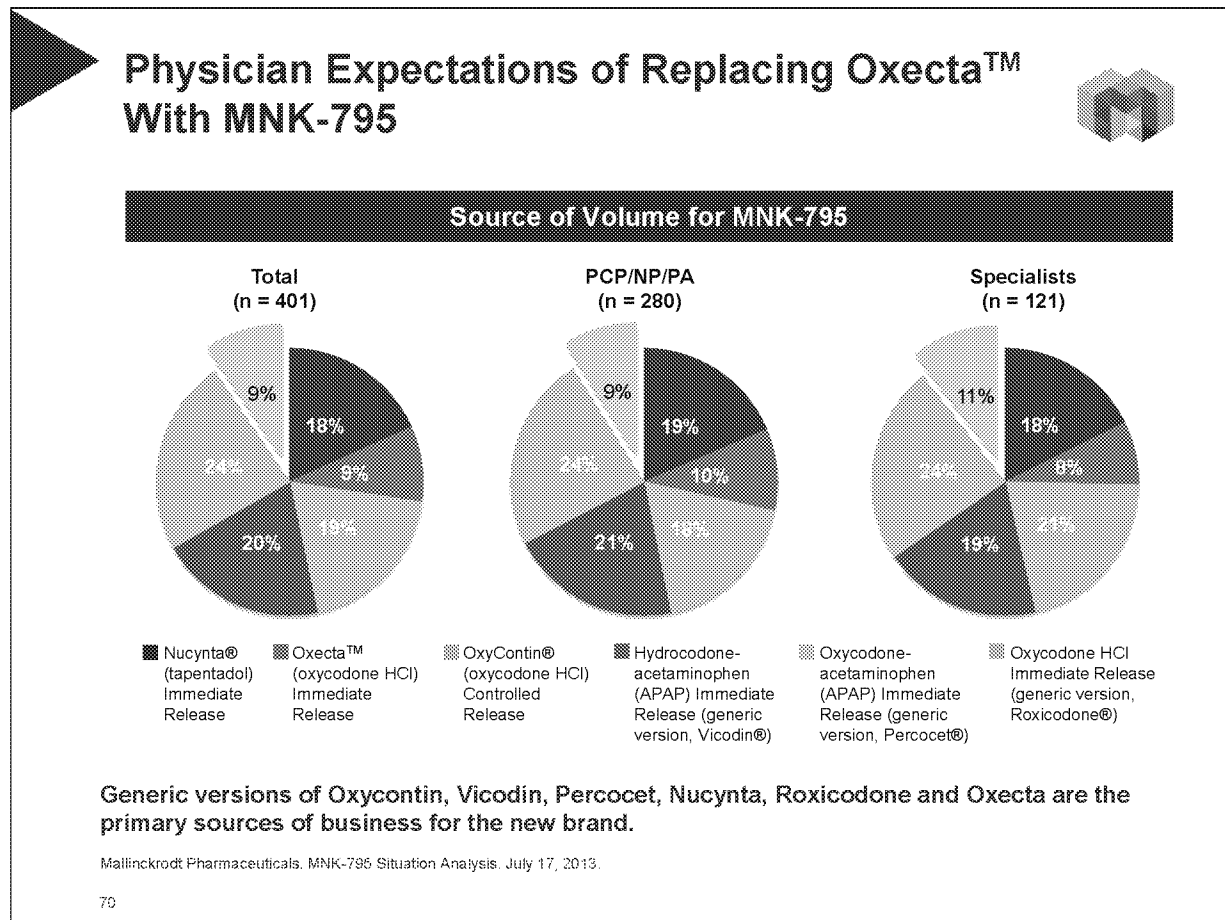
Example image:

[http://www.123rf.com/photo\\_4890831\\_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html](http://www.123rf.com/photo_4890831_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html)

Nucynta PI p. 18A

Nucynta PI p.1 -B



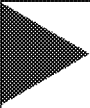


Overall, 9% of physicians would replace a portion of their Oxecta prescriptions with scripts for MNK-795. There was a slight difference between specialists and primary care physicians (8% vs 10%, respectively).


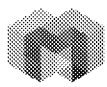
#### Reference

Mallinckrodt Pharmaceuticals. MNK-795 Situation Analysis. July 17, 2013.

Situation analysis slide 83



## Oxecta™: Product Basics



- ▶ Oxycodone immediate release
- ▶ Acute moderate-to-severe pain
- ▶ Chronic moderate-to-severe pain
- ▶ Abuse deterrence remains to be demonstrated

Oxecta [package insert] Bristol, TN: King Pharmaceuticals; 2013.

71

An immediate-release oxycodone product, the abuse deterrence characteristics of Oxecta are achieved through the addition of sodium lauryl sulfate, which makes sniffing the crushed form unpleasant, and attempts to liquify it result in a gel that is difficult to inject.<sup>1</sup>

Oxecta should not be administered via nasogastric, gastric or other feeding tubes because it may cause obstruction of feeding tubes.<sup>2</sup>

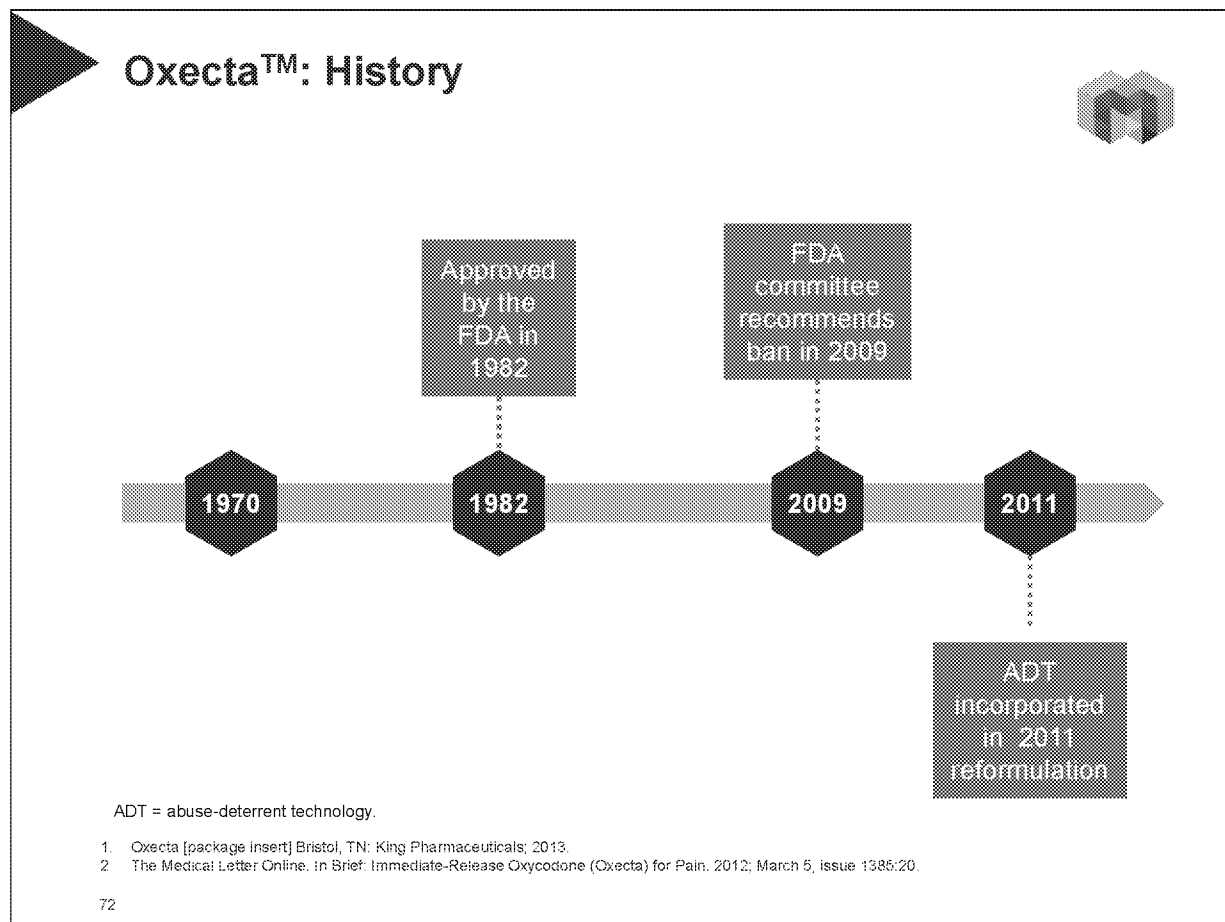
#### References

OPTUMRx RxNews — Drug Approvals. Oxecta™ (oxycodone) — New Drug Approval. June 20, 2100. Available at: <https://www.optumrx.com/RxsoIHcpWeb/cmsContent.do?pageUrl=/HCP/RxNews/DrugApprovals/2011&pageName=07012011Oxecta&disclaimer=RxNewsDisclaimer>. Accessed October 17, 2013.

Oxecta (oxycodone HCl, USP) [package insert] Bristol, TN: King Pharmaceuticals; 2013.

Example image:

[http://www.123rf.com/photo\\_4890831\\_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html](http://www.123rf.com/photo_4890831_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html)



The original approval date of Oxecta™ (oxycodone hydrochloride) was 1982. Oxecta was reformulated and FDA-approved in 2011, and now uses a tamper-resistant technology designed to discourage oxycodone abuse through either nasal or injectable routes of administration. Dissolution of the tablet in ethanol or water reduces it to a gelatinous compound, which complicates injection, and inhalation of the crushed tablet intranasally induces nasal burning and irritation due to the sodium lauryl sulfate.<sup>1,2</sup> Whether or not the reformulation actually does prevent its abuse remains to be demonstrated.<sup>1</sup>


#### References

The Medical Letter Online. In Brief: Immediate-Release Oxycodone (Oxecta) for Pain. 2012; March 5, issue 1385:20.  
 Oxecta approval - OptumRx.com - RxNews®

#### COMMENTS:

Generic introduction

**Getting to Know the Competition: Oxecta™**



- ▶ Oxycodone IR
- ▶ Tamper-resistant ADT
- ▶ Designed to deter injection and snorting
- ▶ Abuse deterrence remains to be demonstrated

ADT = abuse-deterrent technology.

Oxecta [package insert] Bristol, TN: King Pharmaceuticals; 2013.

73

Use of similarly designed abuse-deterrent technology (ADT)-reformulated tablets has been associated with swallowing difficulties.<sup>1</sup>

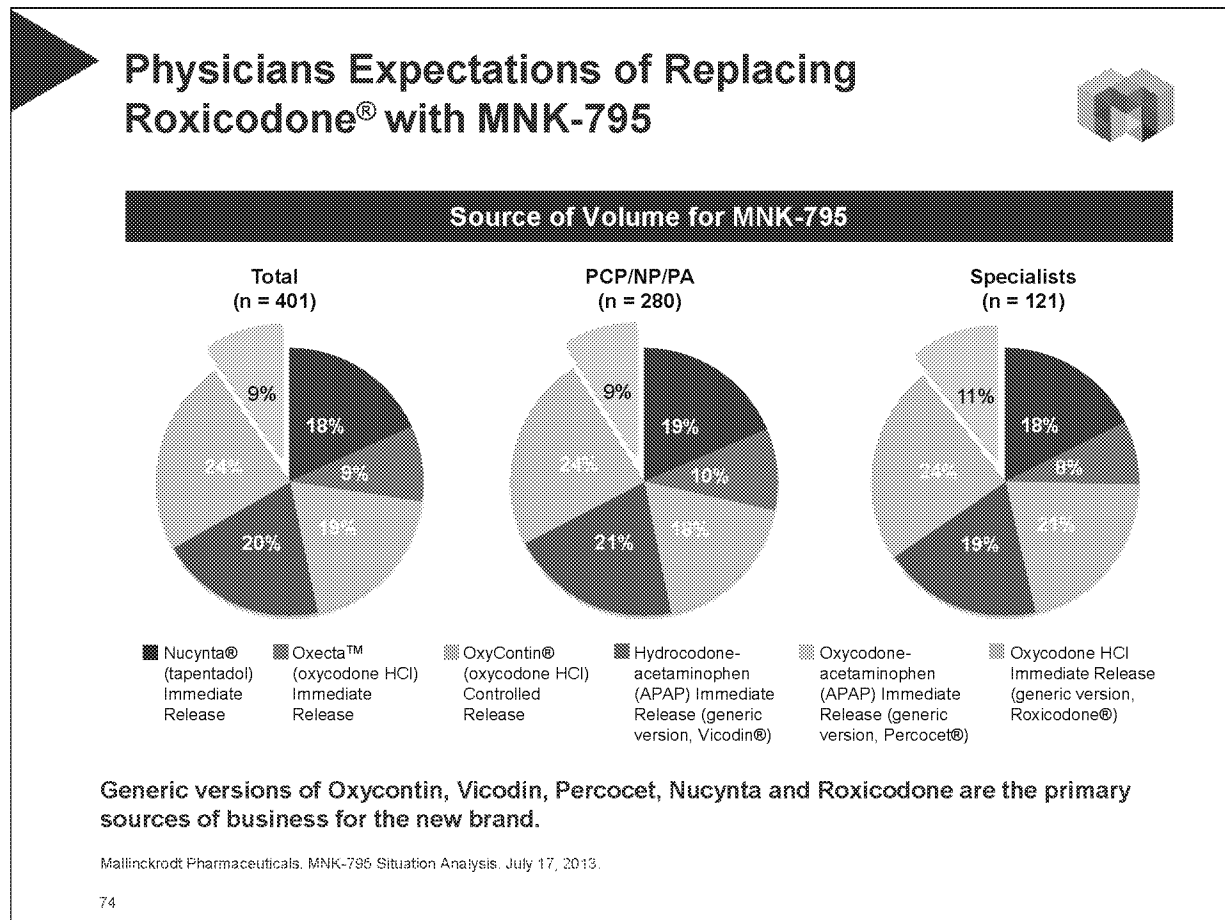
Oxecta™ has an indication for both acute and chronic moderate-to-severe pain. Oxecta has been found bioequivalent to other immediate-release oxycodone commercially available formulations when taken in the fasted state. When it is taken with a high-fat meal, its pharmacokinetic properties differ; however, these differences are not considered clinically significant.<sup>2</sup>

#### References

The Medical Letter Online. In Brief: Immediate-Release Oxycodone (Oxecta) for Pain. 2012; March 5, issue 1385:20.  
Oxecta (oxycodone HCl, USP) [package insert] Bristol, TN: King Pharmaceuticals; 2013.

Example image:

[http://www.123rf.com/photo\\_4890831\\_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html](http://www.123rf.com/photo_4890831_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html)

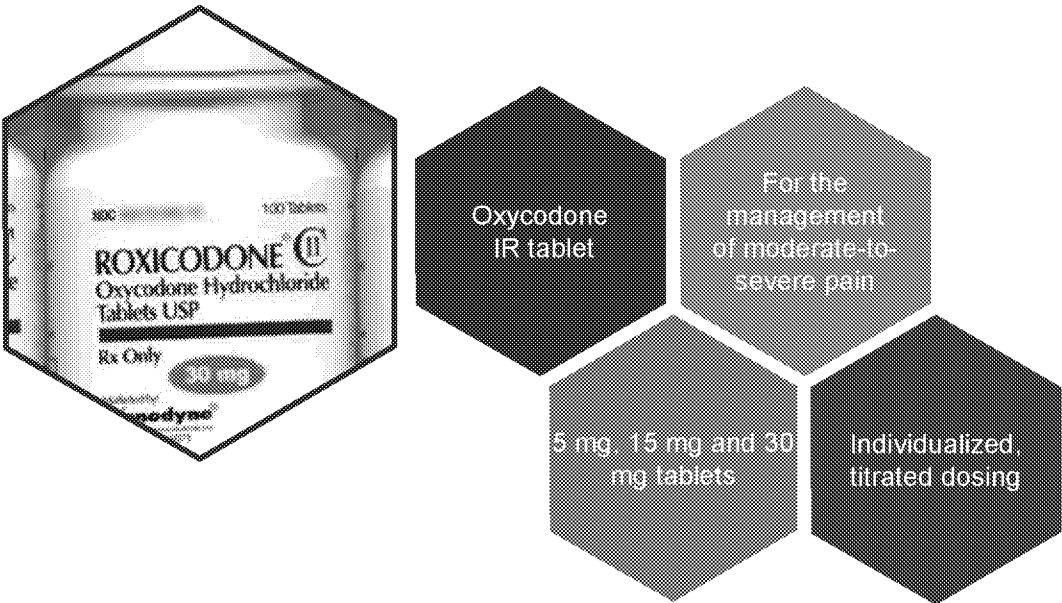


Overall, 9% of physicians would replace a portion of their oxycodone IR (generic and Roxicodone®) prescriptions with scripts for MNK-795. There was a slight difference between specialists and primary care physicians (11% vs 9%, respectively).

#### Reference

Mallinckrodt Pharmaceuticals. MNK-795 Situation Analysis. July 17, 2013.

**Roxicodone®: Product Basics**



Roxicodone [package insert] Hazelwood, MO: Mallinckrodt Pharmaceuticals; 2012.

75

Roxicodone® is an immediate-release formulation of oxycodone, the same analgesic found in controlled-release OxyContin®. Individualized titration is recommended. For severe chronic pain, dosing should be carried out on a regular schedule of every 4 to 6 hours.

#### Reference

Roxicodone (oxycodone hydrochloride tablets USP) [package insert] Hazelwood, MO: Mallinckrodt Pharmaceuticals; 2012.

#### Example image:

<http://trade.indiamart.com/details.mp?offer=4417098748>

Roxicodone PI p 5A

Roxicodone PI p 5A

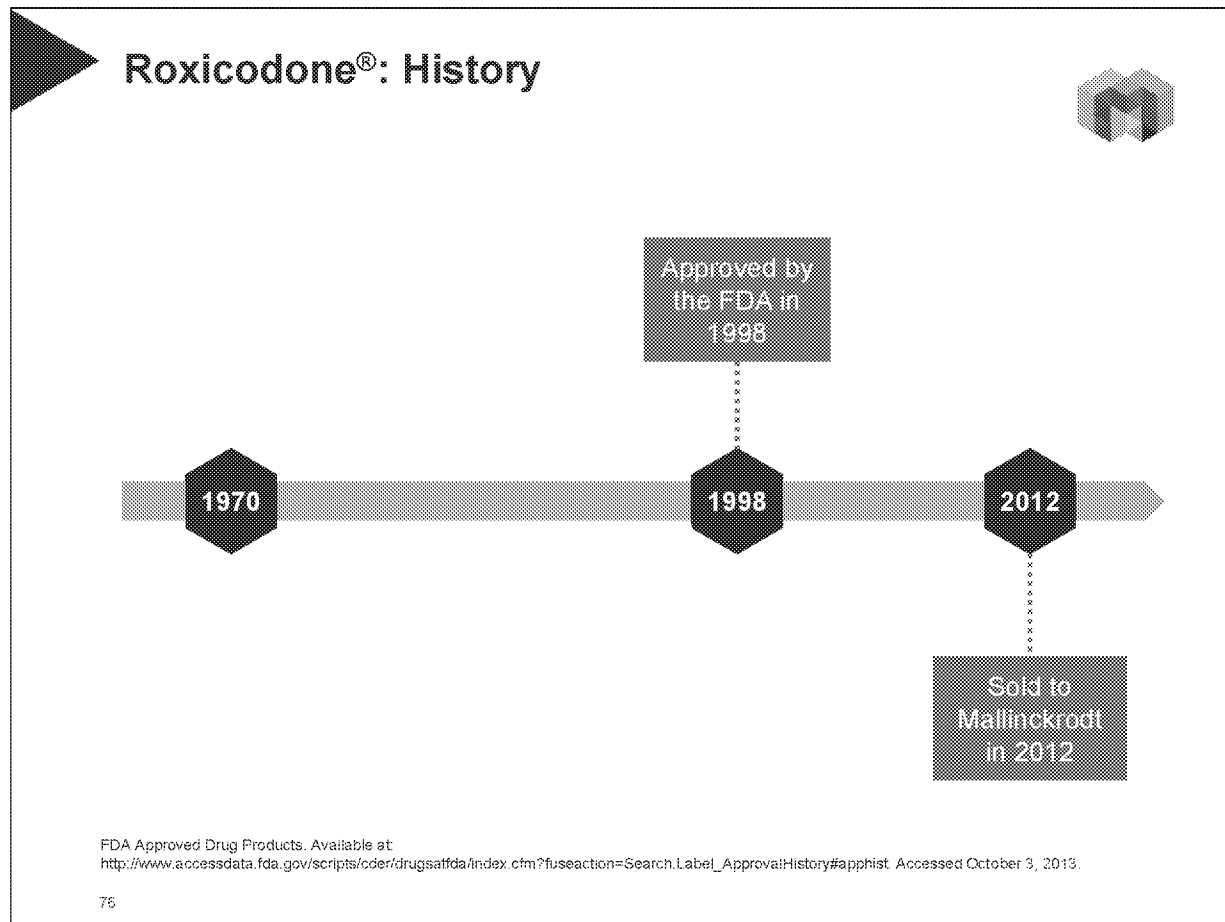
Roxicodone PI p 11A

Roxicodone PI p 12A

Roxicodone PI p 11B

Roxicodone PI p 5A

Roxicodone [package insert] Hazelwood, MO: Mallinckrodt Pharmaceuticals; 2012.



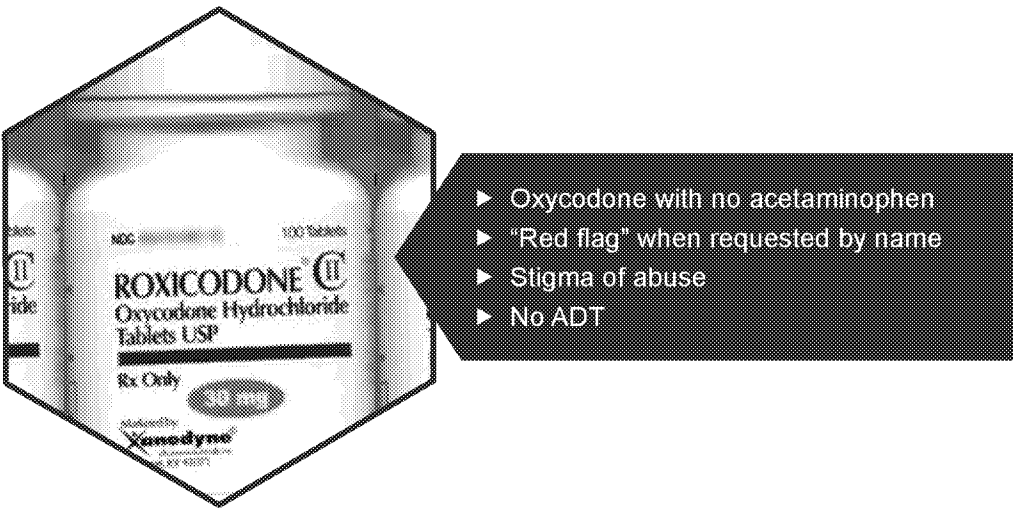
The original approval date of Roxicodone® (oxycodone hydrochloride) was October 26, 1998, FDA application number (NDA) 020932. Roxicodone was originally licensed to Roxane. A reformulation was granted to Xanodyne Pharmaceuticals in 2009, and it was then sold to Mallinckrodt in the year 2012.

#### Reference

FDA Approved Drug Products. Available at:

[http://www.accessdata.fda.gov/scripts/cder/drugsatfda/index.cfm?fuseaction=Search.Label\\_ApprovalHistory#applist](http://www.accessdata.fda.gov/scripts/cder/drugsatfda/index.cfm?fuseaction=Search.Label_ApprovalHistory#applist). Accessed October 3, 2013.

**Getting to Know the Competition: Roxicodone®**



- ▶ Oxycodone with no acetaminophen
- ▶ "Red flag" when requested by name
- ▶ Stigma of abuse
- ▶ No ADT

1. Roxicodone [package insert] Hazelwood, MO: Mallinckrodt Pharmaceuticals; 2012.  
2. Osgood ED, et al. *Am J Drug Alcohol Abuse*. 2012;38(2):166-170.

77

Roxicodine is simply oxycodone without the acetaminophen. When requested by name it raises a "red flag" in the eyes of physicians who prescribe opioids for pain and pharmacists who fill prescriptions because there is a stigma of abuse attached to the brand, which has no ADT technology.

#### Reference

1. Roxicodone [package insert] Hazelwood, MO: Mallinckrodt Pharmaceuticals; 2012.
2. Osgood ED, Easton TA, Trudeau JJ, Katz NP. A brief survey to characterize oxycodone abuse patterns in adolescents enrolled in two substance abuse recovery high schools. *Am J Drug Alcohol Abuse*. 2012;38(2):166-170.

Example image:

[http://www.123rf.com/photo\\_4890831\\_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html](http://www.123rf.com/photo_4890831_pills-spilling-out-of-a-tipped-over-pill-bottle-onto-a-dollar.html)



## Summary



- ▶ Targeted competitors include Oxycontin®, Vicodin®, Percocet®, Nucynta® and Roxicodone.
- ▶ Vicodin and Percocet have been on the market for nearly 40 years.
- ▶ In 2006 Americans were written 130 million prescriptions for hydrocodone-containing products.
- ▶ Hydrocodone combos capture the vast majority of the acute pain market.
- ▶ Oxecta™ and Nucynta® ER have grown substantially over the last year while Nucynta has experienced negative growth.

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